

SUIT NO. 1019582

PARISH OF CAMERON ET AL

VS

AUSTER OIL AND GAS INC ET AL

CARMOUCHE, JOHN H

17405 PERKINS RD

BATON ROUGE, LA 70810

TALBOT CARMOUCHE & MARCELLO

UNASSIGNED, UNASSIGNED

UNASSIGNED

DIVISON:

TYPE:

DATE FILED: 02/04/2016

DATE AS OF: 05/22/2018

SUIT STATUS: OPN

Page: 1

| COUNT | DATE | PCODE | DESCRIPTION | PARTY | COSTS | RUNNING COSTS | DEPOSITS | PAYEE | PAID_DATE | REFERENCE # |
|-------|------------|--------|-------------------------------------|-------|---------|---------------|----------|--------|------------|-------------|
| 1 | 02/04/2016 | 000068 | ADM-NEW SUIT | P 1 | -22.00 | -22.00 | | 000001 | 02/12/2016 | 22657 |
| 2 | 02/04/2016 | 005600 | JUDICIAL EXPENSE FUND | P 1 | -15.00 | -37.00 | | 005600 | 02/26/2016 | 22690 |
| 3 | 02/04/2016 | 000201 | JUDGES' SUPPLEMENTAL COMP FUND | P 1 | -24.00 | -61.00 | | 000201 | 02/26/2016 | 22687 |
| 4 | 02/04/2016 | 005605 | SUPREME COURT ACT 405 | P 1 | -0.50 | -61.50 | | 027832 | 02/26/2016 | 22694 |
| 5 | 02/04/2016 | 005316 | SUPREME COURT OF LOUISIANA | P 1 | -5.00 | -66.50 | | 005316 | 02/26/2016 | 22689 |
| 6 | 02/04/2016 | 000516 | CASE PROCESSING FEES/CASE | P 1 | -5.00 | -71.50 | | 000001 | 02/12/2016 | 22657 |
| 7 | 02/04/2016 | 000001 | FR PET;CC;WITH HOLD CITATIONS | P 1 | -270.00 | -341.50 | | 000001 | 02/26/2016 | 22682 |
| 8 | 02/04/2016 | 000001 | FR SUPREME COURT REPORTING FORM | P 1 | -6.00 | -347.50 | | 000001 | 02/12/2016 | 22657 |
| 9 | 02/05/2016 | 000000 | DEPOSIT - TALBOT CARMOUCHE | P 1 | | -347.50 | 250.00 | 000000 | 02/05/2016 | 14411 |
| 10 | 02/22/2016 | 000000 | DEPOSIT - TALBOT CARMOUCHE | P 1 | | -347.50 | 97.50 | 000000 | 02/22/2016 | 14451 |
| 11 | 03/14/2016 | 000001 | FR PET OF INTERVENTION/NO SERVICE | P 2 | -29.00 | -376.50 | | 000001 | / / | |
| 12 | 03/28/2016 | 000001 | FR RULE TO SHOW CAUSE | P 2 | -13.00 | -389.50 | | 000001 | / / | |
| 13 | 03/28/2016 | 000016 | RULE FIXED FOR 04-25-16 @ 10 | P 2 | 0.00 | -389.50 | | 000001 | / / | |
| 14 | 03/31/2016 | 000001 | FR ORDER | P 2 | -13.00 | -402.50 | | 000001 | / / | |
| 15 | 04/13/2016 | 000001 | FR PET OF INTERVENTION/HOLD SERVICE | P 3 | -45.00 | -447.50 | | 000001 | / / | |
| 16 | 04/21/2016 | 000055 | ISSUE CITATION-26 | P 1 | -520.00 | -967.50 | | 000001 | 05/16/2016 | 22793 |
| 17 | 04/22/2016 | 000001 | FR NOTICE OF REMOVAL/FAX | D 18 | -173.00 | -1140.50 | | 000001 | 05/02/2016 | 22771 |
| 18 | 04/25/2016 | 000000 | DEPOSIT - LISKOW & LEWIS | D 18 | | -1140.50 | 173.00 | 000000 | 04/25/2016 | 97513 |
| 19 | 05/09/2016 | 000000 | DEPOSIT -TALBOT CARMOUCHE | P 1 | | -1140.50 | 520.00 | 000000 | 05/09/2016 | 14685 |
| 20 | 06/13/2016 | 000000 | DEPOSIT -JONES WALKER | D 2 | | -1140.50 | 33.00 | 000000 | 06/13/2016 | 6238578 |
| 21 | 06/13/2016 | 000001 | FR SUPPLEMENTAL NOTICE OF REMOVAL | D 2 | -29.00 | -1169.50 | | 000001 | 06/15/2016 | 22833 |
| 22 | 05/11/2018 | 000000 | DEPOSIT -TALBOT CARMOUCHE | P 1 | | -1169.50 | 335.00 | 000000 | 05/11/2018 | 16843 |
| 23 | 05/11/2018 | 000049 | REQUEST FOR WRITTEN NOTICE/TRIAL | P 1 | -29.00 | -1198.50 | | 000001 | 05/15/2018 | 23980 |
| 24 | 05/11/2018 | 000001 | FR LETTER TO ISS ORIG PET/4 | P 1 | -93.00 | -1291.50 | | 000001 | 05/15/2018 | 23980 |
| 25 | 05/14/2018 | 000001 | FR US DIST COURT DOCKET SHEET | D 18 | -134.00 | -1425.50 | | 000001 | / / | |
| 26 | 05/14/2018 | 000028 | FRC JUDGMENT | D 18 | -6.00 | -1431.50 | | 000001 | / / | |
| 27 | 05/15/2018 | 008000 | POSTAGE (ACT 243) | P 1 | -13.24 | -1444.74 | | 000001 | / / | |
| 28 | 05/17/2018 | 000049 | REQUEST FOR WRITTEN NOTICE/TRIAL | D 22 | -15.00 | -1459.74 | | 000001 | / / | |
| 29 | 05/17/2018 | 000001 | FAX CHARGES | D 22 | -32.00 | -1491.74 | | 000001 | / / | |
| 30 | 05/18/2018 | 000000 | DEPOSIT -GUGLIELMO LOPEZ | D 27 | | -1491.74 | 50.00 | 000000 | / / | 055370 |
| 31 | 05/18/2018 | 000049 | REQUEST FOR WRITTEN NOTICE/TRIAL | D 27 | -36.00 | -1527.74 | | 000001 | / / | |
| 32 | 05/21/2018 | 000000 | DEPOSIT -KEAN MILLER LLP | D 14 | | -1527.74 | 25.00 | 000000 | / / | 301946 |
| 33 | 05/21/2018 | 000000 | DEPOSIT -WALL BULLINGTON & COOK LLC | D 22 | | -1527.74 | 47.00 | 000000 | / / | 6987 |

| LEDGER BALANCE | | |
|------------------|----------|--|
| Deposits | 1530.50 | |
| PrePaid Deposits | 0.00 | |
| <hr/> | | |
| Total Deposits | 1530.50 | |
| Costs | -1527.74 | |
| PrePaid Costs | 0.00 | |
| <hr/> | | |
| Total Costs | -1527.74 | |
| Refunds | 0.00 | |
| <hr/> | | |
| Ledger Balance | 2.76 | |
| <hr/> | | |
| Escrows | 0.00 | |

| CASH BALANCE | | |
|------------------|----------|--|
| Deposits | 1408.50 | |
| PrePaid Deposits | 0.00 | |
| <hr/> | | |
| Total Deposits | 1408.50 | |
| Costs | -1191.50 | |
| PrePaid Costs | 0.00 | |
| <hr/> | | |
| Total Costs | -1191.50 | |
| Refunds | 0.00 | |
| <hr/> | | |
| Cash Balance | 217.00 | |
| <hr/> | | |
| Escrows | 0.00 | |

38TH JUDICIAL DISTRICT COURT FOR THE PARISH OF CAMERON

STATE OF LOUISIANA

DOCKET NO. 10-19582

THE PARISH OF CAMERON

VERSUS

AUSTER OIL AND GAS, INC., APACHE OIL CORPORATION, AMERICA
PRODUCTION COMPANY, CHEVRON PIPE LINE COMPANY, CHEVRON U.S.A.
HOLDINGS, INC., CHEVRON U.S.A., INC., DARSEY OPERATING CORPORATION
ENERVEST OPERATING, L.L.C., EXXON MOBIL CORPORATION, FREEPORT
SULPHUR COMPANY, GULFPORT ENERGY CORPORATION, HILCORP ENERGY
COMPANY, HONEYWELL INTERNATIONAL, INC., KERR-MCGEE OIL AND GAS
ONSHORE LP, RESOURCE SECURITIES CORPORATION, SAMUEL GARY JR. &
ASSOCIATES, INC., SHELL OFFSHORE, INC., SHELL OIL COMPANY, STAR
ENERGY, INC., SWEPI LP, TAYLOR ENERGY COMPANY LLC, TEXAS PACIFIC
OIL COMPANY, INC., TEXAS PETROLEUM INVESTMENT COMPANY, THE
TEXAS COMPANY, TRANSCONTINENTAL OIL CORPORATION AND VERNON E.
FAULCONER, INC.

FILED: _____

DEPUTY CLERK

PETITION FOR DAMAGES
TO THE
CAMERON PARISH COASTAL ZONE

NOW INTO COURT come plaintiffs, through undersigned counsel, to allege the following:

PARTIES PLAINTIFF AND DEFENDANT

1.

The Plaintiffs are: (1) the PARISH OF CAMERON, and (2) the State of Louisiana *ex rel.* PARISH OF CAMERON. The Parish of Cameron is a local government of this State that has been authorized since 1983 to operate an approved Local Coastal Zone Management Program pursuant to La. R.S. 214.28. As shown more fully below, the Parish of Cameron is authorized by state statute to bring appropriate actions on its own behalf and in the name of the State of Louisiana for enforcement of the State and Local Coastal Resources Management Act of 1978, as amended (La. R.S. 214.21, *et seq.*, hereinafter, the “CZM Act of 1978”), and the applicable

regulations, rules, orders and ordinances promulgated or adopted thereunder by the State or Cameron Parish, as amended (hereinafter, collectively and together with the CZM Act of 1978, the "**CZM Laws**").

2.

Made defendants herein are the following entities (hereinafter, collectively, "**Defendants**"):

AUSTER OIL AND GAS, INC. is domestic corporation whose registered agent, John A. Hogan, is located at 2036 Olene Drive, Sulphur, Louisiana 70663. Auster Oil and Gas, Inc. is named as successor to **R-5, Inc.**

APACHE OIL CORPORATION is a foreign corporation whose registered agent, C T Corporation System, is located at 350 N. St. Paul Street, STE. 2900, Dallas, TX. Apache Oil Corporation is named as successor in interest to **Apache Corporation.**

BP AMERICA PRODUCTION COMPANY is a foreign corporation whose registered agent, C T Corporation System, is located at 5615 Corporate Blvd., STE. 400B, Baton Rouge, LA 70808. BP America Production Company is named in its own capacity and as successor to **Amoco Production Company, Pan American Petroleum Company, Pan American Production Company, Stanolind Oil & Gas Company, Vastar Resources and Yount-Lee Oil Company.**

CHEVRON PIPE LINE COMPANY is a foreign corporation whose registered agent, The Prentice-Hall Corporation System, Inc., is located at 320 Somerulos St., Baton Rouge, LA 70802. Chevron Pipe Line Company is named as successor in interest to **Gulf Refining Company.**

CHEVRON U.S.A. HOLDINGS INC. is a foreign corporation whose registered agent, Angie Wang c/o ChevronTexaco, is located at P.O. Box 6028, San Ramon, CA 94583. Chevron U.S.A. Holdings, Inc. is named as successor to **Texaco E&P, Inc. and Texaco, Inc.**

CHEVRON U.S.A. INC. is a foreign corporation whose registered agent, The Prentice-Hall Corporation System, Inc., is located at 320 Somerulos St., Baton Rouge, LA 70802. Chevron U.S.A., Inc. is named in its own capacity and as successor to **Chevron Oil Company**, **Gulf Oil Corporation** and **The California Company**.

DARSEY OPERATING CORPORATION is a domestic corporation whose registered agent, William G. Darsey, III, is located at 120 Rue Beauregard, Suite 100, Lafayette, LA 70505.

ENERVEST OPERATING, L.L.C. is a foreign company whose registered agent, C T Corporation System, is located at 5615 Corporate Blvd., STE. 400B, Baton Rouge, LA 70808.

EXXON MOBIL CORPORATION is a foreign corporation whose registered agent, Corporation Service Company, is located at 320 Somerulos St., Baton Rouge, LA 70802. Exxon Mobil Corporation is named as successor to **The Superior Oil Company**.

FREEPORT SULPHUR COMPANY is a foreign corporation whose principal place of business is located in New Orleans, Louisiana, and whose registered agent, Corporation Service Company, is located at 320 Somerulos St., Baton Rouge, LA 70802.

GULFPORT ENERGY CORPORATION is a foreign corporation whose registered agent, David L. Patron, is located at c/o Phelps Dunbar LLP, 365 Canal Street, Suite 2000, New Orleans, Louisiana 70130-6534. Gulfport Energy Corporation is named in its own capacity and as successor to **Southern Petroleum Company** and **WRT Energy Corporation**.

HILCORP ENERGY COMPANY is a foreign corporation whose registered agent, C T Corporation System, is located at 5615 Corporate Blvd., STE. 400B, Baton Rouge, LA 70808.

HONEYWELL INTERNATIONAL INC. is a foreign corporation whose registered agent, Corporation Service Company, is located at 320 Somerulos Street, Baton Rouge, Louisiana 70802. Honeywell International, Inc. is named as successor to **The Union Sulphur Company** and **Union Oil & Gas Corporation of Louisiana**.

KERR-MCGEE OIL AND GAS ONSHORE LP is a foreign limited partnership whose registered agent, CT Corporation System, is located at 5615 Corporate Boulevard, Suite 400B,

Baton Rouge, Louisiana 70808. Kerr-McGee Oil and Gas Onshore LP is named as successor to **Sun Exploration & Production Co.**

RESOURCE SECURITIES CORPORATION is a domestic corporation whose registered agent, Wayne Hyman, is located at 124 Oak Coulee Drive, Lafayette, Louisiana 70507.

SAMUEL GARY JR. & ASSOCIATES, INC. is a foreign corporation whose registered agent, CT Corporation System, is located at 5615 Corporate Boulevard, Suite 400B, Baton Rouge, Louisiana 70808.

SHELL OFFSHORE INC. is a foreign corporation whose registered agent, C T Corporation System, is located at 5615 Corporate Blvd., Ste. 400B, Baton Rouge, LA 70808.

SHELL OIL COMPANY is a foreign corporation whose registered agent, C T Corporation System, is located at 5615 Corporate Blvd., Ste. 400B, Baton Rouge, LA 70808.

STAR ENERGY, INC. is a domestic corporation whose registered agent, W. Miguel Swanwick, is located at 121 River Drive, Lafayette, Louisiana 70503.

SWEPI LP is a foreign partnership whose registered agent, C T Corporation System, is located at 5615 Corporate Boulevard, Suite 400B, Baton Rouge, Louisiana 70808. SWEPI LP is named as successor to **Shell Western E&P Inc.**

TAYLOR ENERGY COMPANY LLC is a domestic limited liability company whose member, Phyllis M. Taylor, is domiciled in New Orleans, Louisiana, and whose registered agent, Paul J. Goodwine, is located at c/o Looper Goodwine & Ballew, 601 Poydras Street, Suite 2200, New Orleans, Louisiana 70130. Taylor Energy Company LLC is named as successor to **Taylor Energy Company.**

TEXAS PACIFIC OIL COMPANY, INC. is a foreign corporation whose registered agent, CT Corporation System, is located at 5615 Corporate Boulevard, Suite 400B, Baton Rouge, Louisiana 70808.

TEXAS PETROLEUM INVESTMENT COMPANY is a foreign corporation whose registered agent, Patrick S. Ottinger, is located at 1313 W. Pinhook Rd., Lafayette, LA 70503.

THE TEXAS COMPANY is a foreign corporation whose registered agent, The Prentice-Hall Corporation System, Inc., is located at 320 Somerulos St., Baton Rouge, LA 70802.

TRANSCONTINENTAL OIL CORPORATION is a foreign corporation whose registered agent, CT Corporation System, is located at 5615 Corporate Boulevard, Suite 400B, Baton Rouge, Louisiana 70808.

VERNON E. FAULCONER, INC. is a foreign corporation whose registered agent, C T Corporation System, is located at 5615 Corporate Boulevard, Suite 400B, Baton Rouge, LA 70808.

AREAL EXTENT OF COMPLAINED-OF OPERATIONS

3.

In general, Plaintiffs allege below that certain of Defendants' oil and gas exploration, production and transportation operations associated with the development of the East Hackberry and West Hackberry Oil & Gas Fields in Cameron Parish were conducted in violation of the CZM Laws and that these activities caused substantial damage to land and waterbodies located in the "**Coastal Zone**" (hereinafter so called), as defined by the CZM Act of 1978, within Cameron Parish. A map of the entire Louisiana Coastal Zone is attached hereto as **Exhibit A**.

In the detailed allegations that follow, the term "**Operational Area**" (hereinafter so called) is used to describe the geographic extent of the area within which the complained-of operations and activities occurred. On information and belief, the areal extent of the Operational Area is identified on the maps contained in **Exhibit B** attached hereto.

JURISDICTION, VENUE, AND STATUTORY AND REGULATORY FRAMEWORK

4.

The CZM Act of 1978 states that it is the public policy of the state “[t]o protect, develop, and where feasible, restore or enhance the resources of the state’s coastal zone.” La. R.S. 49:214.22(1).

5.

Louisiana’s Coastal Zone is specifically defined in La. R.S. 49:214.24(5). See Exhibit A. The Coastal Zone includes “the coastal waters and adjacent shorelands within the boundaries of the coastal zone” The term “coastal waters” includes “bays, lakes, inlets, estuaries, rivers, bayous, and other bodies of water within the boundaries of the coastal zone which have measurable seawater content (under normal weather conditions over a period of years).” La. R.S. 49:214.23(4).

6.

The Operational Area is located in Cameron Parish and within the Coastal Zone, and therefore certain activities within the Operational Area are governed by the CZM Laws.

7.

The CZM Laws regulate certain “uses” within the Coastal Zone. La. R.S. 49:214.30 states that “[n]o person shall commence a use of state or local concern without first applying for and receiving a coastal use permit.” A map of the coastal use permits known to have been issued for work within the Operational Area is attached hereto as Exhibit C. A list of those coastal use permits is attached hereto as Exhibit D. The term “use” is defined at La. R.S. 49:214.23(13) as “any use or activity within the coastal zone which has a direct and significant impact on coastal waters.” “Uses of state concern” are defined as:

“Those uses which directly and significantly affect coastal waters and which are in need of coastal management and which have impacts of greater than local significance or which significantly affect interests of regional, state, or national concern. Use of state concern shall include, but not be limited to:

(a) Any dredge or fill activity which intersects with more than one water body.

(b) Projects involving use of state owned lands or water bottoms.

* * *

(f) All mineral activities, including exploration for, and production of oil, gas, and other minerals, all dredge and fill uses associated therewith, and all other associated uses.

(g) All pipelines for the gathering, transportation or transmission of oil, gas and other minerals.

(h) Energy facility siting and development.”

(La. R.S. 49:214.25(A)(1)).

8.

“Uses of local concern” are defined as:

“Those uses which directly and significantly affect coastal waters and are in need of coastal management but are not uses of state concern and which should be regulated primarily at the local level if the local government has an approved program. Uses of local concern shall include, but not be limited to:

(a) Privately funded projects which are not uses of state concern.

* * *

(c) Maintenance of uses of local concern.

* * *

(e) Dredge or fill projects not intersecting more than one water body.

* * *

(i) Maintenance dredging.

* * *

(k) Uses on cheniers, salt domes, or similar land forms.”

(La. R.S. 49:214.25(A)(2)).

9.

Enforcement of the CZM Laws is within the authority, *inter alia*, of an appropriate district attorney or a local government with an approved program. La. R.S. 49:214.36D. The Parish of Cameron, having obtained approval of its Coastal Zone Management Program from the

Secretary of the Louisiana Department of Natural Resources (hereinafter, the “LDNR”) on January 4, 1985 is a “local government with an approved program” within the meaning of the CZM Laws. *See* La. R.S. 49:214.23(8) and La. R.S. 49:214.28.

10.

Paragraph D of La. R.S. 49:214.36 states that “[t]he secretary [of the LDNR], the attorney general, an appropriate district attorney, or a local government with an approved program may bring such injunctive, declaratory, or other actions as are necessary to ensure that no uses are made of the coastal zone for which a coastal use permit has not been issued when required or which are not in accordance with the terms and conditions of a coastal use permit.” Accordingly, the Parish of Cameron is authorized under the provisions of La. R.S. 49:214.36 to bring appropriate actions in its own behalf and in the name of the State of Louisiana for enforcement of the CZM Laws within Cameron Parish. Plaintiffs are empowered to bring declaratory, civil damages, or other actions as are necessary to ensure that no uses of state or local concern “are made of the coastal zone for which a coastal use permit has not been issued when required or which are not in accordance with the terms and conditions of a coastal use permit.” La. R.S. 49:214.36(D); La. R.S. 16:2D.

11.

Paragraph E of La. R.S. 49:214.36 states that “[a] court may impose civil liability and assess damages; order, where feasible and practical, the payment of the restoration costs; require, where feasible and practical, actual restoration of areas disturbed; or otherwise impose reasonable and proper sanctions for uses conducted within the coastal zone without a coastal use permit where a coastal use permit is required or which are not in accordance with the terms and conditions of a coastal use permit. The court in its discretion may award costs and reasonable attorney’s fees to the prevailing party.”

12.

Paragraph G of La. R.S. 49:214.36 states that “[a]ny action pursuant to this Section... must be brought in any parish in which the use or activity is situated.”

13.

Venue for this action in this district is proper under La. R.S. 49:214.36(G). Plaintiffs are the proper parties to bring the causes of action set forth herein pursuant to La. R.S. 49:214.36(D).

14.

Defendants have engaged in uses of state and local concern in Cameron Parish within the Operational Area in violation of La. R.S. 49:214.21, *et seq.*

15.

The Louisiana CZM Laws require the secretary of the LDNR to develop a coastal management program and guidelines to further the policies and goals of La. R.S. 49:214.21, *et seq.* The adopted guidelines shall be followed in the development of the state program and local programs and shall serve as criteria for the granting, conditioning, denying, or modifying of coastal use permits. One of the goals of the guidelines is the “careful consideration of the impacts of uses on water flow, circulation, quantity, and quality and require that the discharge or release of any pollutant or toxic material into the water or air of the coastal zone be within all applicable limits established by law, or by federal, state, or local regulatory authority.” La. R.S. 49:214.27(3).

16.

The state coastal management regulations contemplated by La. R.S. 49:214.21, *et seq.*, are codified at LAC 43:I.700, *et seq.* These state regulations provide that coastal use permits required by La. R.S. 214.30 are *in addition to* “any other permit or approval required or established pursuant to any other constitutional provision or statute.” LAC 43:I.700. These state regulations further provide that “[m]ineral and production sites shall be cleared, revegetated, detoxified, and otherwise restored as near as practicable to their original condition upon termination of operations to the maximum extent practicable.” LAC 43:I.719.M. As discussed below, Defendants have failed to clear, revegetate, detoxify, and restore the mineral and production sites and other areas affected by their operations and activities within the Operational Area to their original condition, as required by LAC 43:I.719.M. Defendants are liable to

Plaintiffs under the CZM Laws for all damages associated with their failure to adhere to LAC 43:I.719.M.

17.

The coastal zone regulations further require that “[d]rilling and production sites shall be prepared, constructed, and operated using the best practical techniques to prevent the release of pollutants or toxic substances into the environment.” LAC 43:I.719.F. These regulations also require that:

- “[t]he location and operation of waste storage, treatment, and disposal facilities shall be avoided in wetlands to the maximum extent practicable, and best practical techniques shall be used to minimize adverse impacts which may result from such use.” LAC 43:I.715.A
- “[w]aste facilities located in wetlands shall be designed and built to withstand all expectable adverse conditions without releasing pollutants.” LAC 43:I.715.C.
- “[w]aste facilities shall be designed and constructed using best practical techniques to prevent leaching, control leachate production, and prevent the movement of leachate away from the facility.” LAC 43:I.715.D.
- “[a]ll waste disposal sites shall be marked and, to the maximum extent practicable, all components of waste shall be identified.” LAC 43:I.715.F.
- “[w]aste facilities in wetlands with identifiable pollution problems that are not feasible and practical to correct shall be closed and either removed or sealed, and shall be properly revegetated using the best practical techniques.” LAC 43:I.715.G.
- “[w]aste shall be disposed of only at approved disposal sites.” LAC 43:I.715.H.
- “[r]adioactive wastes shall not be temporarily or permanently disposed of in the coastal zone.” LAC 43:I.715.I.

As alleged below, the operations and activities of Defendants within the Operational Area have resulted in the release of contaminants, pollutants, waste, leachate, and toxic substances into the environment and away from the operated facilities, all in violation of LAC 43:I.715.A through I and LAC 43:I.719.F. Furthermore, the drilling and production sites and waste facilities of Defendants within the Operational Area were not built to withstand all expectable adverse conditions without releasing pollutants, were not prepared using best practical techniques to prevent the release of pollutants or toxic substances, and were not designed and constructed to

prevent leaching, control leachate production, or prevent the movement of leachate away from the facility. Defendants are liable for all damages resulting from their violation of the CZM Laws.

18.

Finally, the state coastal zone regulations prohibit the temporary or permanent disposal of radioactive wastes in the coastal zone. LAC 43:I.715.I. The operations and activities of Defendants in the Operational Area have resulted in the disposal of radioactive materials, including radium 226, radium 228, and naturally occurring radioactive materials (NORM), for which Defendants are liable.

FACTUAL ALLEGATIONS

19.

Defendants drilled and/or operated numerous oil and gas wells within the Operational Area. A map showing the oil and gas wells within the Operational Area is attached hereto as Exhibit E. A list of the oil and gas wells drilled and/or operated by each Defendant is attached hereto as Exhibit F. The operations and activities of Defendants alleged in this petition to be in violation of the CZM Laws were conducted (or are being conducted) to enable or support the drilling and operation of the oil and gas wells listed on Exhibit F.

20.

The oil and gas operations and activities of Defendants in the Operational Area included the construction and use of unlined earthen waste pits, which are simply holes, ponds, or excavations dug into the ground or marsh. Many of these waste pits have never been closed or have not been closed in conformance with the state and local CZM Laws and other applicable state environmental laws and regulations, including Statewide Order 29-B and the Louisiana Risk Evaluation/Corrective Action Program (RECAP).

21.

The use of waste pits in the Operational Area has a direct and significant impact on state coastal waters located within Cameron Parish, and thus each such pit required a coastal use permit after the enactment of the CZM Act of 1978. To the extent that, contrary to Plaintiffs' allegations, the use of any such waste pit was legally commenced prior to the enactment of the CZM Act of 1978, the continued existence of such waste pit following cessation of the operations supported by it constituted a new use for which a coastal use permit was required. In addition, the closure of any individual waste pits in the Operational Area would have involved substantial movement of materials and substantial alteration of the native terrain, and likewise required a state and/or local coastal use permit. On information and belief, Defendants never obtained the required state and/or local coastal use permits for the closure and/or post-CZM operations of their waste pits in the Operational Area. Additionally, these waste pits and areas adjacent thereto have never been cleared, revegetated, detoxified, and/or otherwise restored to their original condition as required by LAC 43:I.719.M. Furthermore, Defendants have failed to design and construct their waste pits located in the Operational Area using best practical techniques to prevent leaching and to prevent the movement of leachate away from their waste facilities, as required by LAC 43:I.715.D.

22.

The Defendants use of waste pits in the Operational Area, and their failures to properly close those waste pits, to clear, revegetate, detoxify, and return the property affected thereby to its original condition, and to properly design those waste pits have caused ever increasing damage to the Cameron Parish Coastal Zone, for which Defendants are liable under the CZM Laws.

23.

Defendants have also discharged or disposed of oil field wastes from their waste pits and/or from their other oil and gas operations directly into the Operational Area. Each incident involving the discharge of oil field waste, including, without limitation, oil field brines, has a direct and significant impact on state coastal waters located in Cameron Parish and constitutes a

use for which a state and/or local coastal use permit was required after the enactment of CZM Act of 1978 (Acts 1978, No. 361). On information and belief, Defendants never obtained the required state and/or coastal use permits for the discharge of oil field wastes into the Operational Area. Additionally, the areas of the Cameron Parish Coastal Zone that have received such discharges have never been cleared, revegetated, detoxified, and otherwise restored to their original condition as required by LAC 43:I.719.M. Furthermore, Defendants failed to prevent the release of pollutants or toxic substances into the environment in accordance with LAC 43:I.719.F, and failed to design and construct their waste pits in a manner to prevent leaching and the resulting discharge wastes, as required by LAC 43:I.715.D. Finally, Defendants knew or should have known that their oilfield wastes contain unacceptable and inherently dangerous levels of radioactive materials, including Radium 226 and 228, and thus the discharge of such materials into the Operational Area after 1978 was a flagrant violation of the CZM Laws, particularly LAC 43:I.715.I. As a result of these failures, Defendants are liable under the CZM Laws for damages and the other relief sought herein.

24.

In addition to the use of unpermitted waste pits, the failure to close waste pits properly, and the unpermitted discharge of oil field waste, including, without limitation, oilfield brines, in the Operational Area, Defendants' oil and gas activities have caused the Cameron Parish Coastal Zone, and in particular the canals, bayous, sediments, marshes, soils, and groundwaters in the Operational Area, to become contaminated or polluted in excess of applicable state standards, which has a direct and significant impact on state coastal waters. Each of these uses constitutes a use for which a coastal use permit was required beginning with the enactment of the CZM Act of 1978. The state coastal zone regulations, at LAC 43:I.700, *et seq.*, define "contaminant" as "an element causing pollution of the environment that would have detrimental effects on air or water quality or on native floral or faunal species." The contamination deposited in the Operational Area as a result of Defendants' activities has had a detrimental effect on the quality of the receiving state waters, on plant and animal life, and on humans who are exposed to such contamination. In addition, Defendants have utilized the Operational Area for the storage of

their pollution or contamination, which likewise is a use for which a state and/or local coastal use permit has been required since 1978. On information and belief, Defendants never obtained the required state and/or local coastal use permits for the deposition or storage of contamination or pollution in the Operational Area. The areas of the Cameron Parish Coastal Zone that have been affected by such pollution or contamination have never been cleared, revegetated, detoxified, and otherwise restored to their original condition as required by LAC 43:I.719.M. Furthermore, Defendants have failed to prevent the release of pollutants or toxic substances into the environment in accordance with LAC 43:I.719.F. Defendants have also allowed the accumulation of radioactive materials in the soils and groundwaters of the Operational Area, in violation of LAC 43:I.715.I. Defendants are thus liable for their acts of contamination in violation of the CZM Laws, including La. R.S. 49:214.36.

25.

Since 1978 and before, Defendants' oil and gas activities have resulted in the dredging of numerous canals in, through, and across the Operational Area. The dredging of canals in the Operational Area has a direct and significant impact on the state coastal waters within Cameron Parish. On information and belief, Defendants in some instances exceeded the limits of the coastal use permits issued in connection with the dredging of such canals, and in other instances failed to obtain the coastal use permits required for the dredging of such canals. Furthermore, Defendants failed to design, construct and maintain said canals using the best practical techniques to prevent bank slumping, erosion and saltwater intrusion and to minimize the potential for inland movement of storm-generated surges in accordance with LAC 43:I.705.J. As a consequence thereof, Defendants' dredging activities have resulted in the degradation of the Operational Area, including the erosion of marshes and the degradation of terrestrial and aquatic life therein. Additionally, the destruction of the Cameron Parish Coastal Zone has increased the risk of damage from storm-generated surges and other flooding damage, and has enabled and/or accelerated saltwater intrusion. Furthermore, Defendants failed to revegetate, refill, clean, detoxify, and otherwise restore these canals to their original condition as required by LAC 43:I.705.N, 711.F and 719.M.

26.

The above activities of Defendants lie in stark contrast to, and in violation of, the policies enumerated at LAC 43:I.701(G), which states as follows:

“It is the policy of the coastal resources program to avoid the following adverse impacts . . . :

- (4) alterations in the natural concentration of oxygen in coastal waters;
- (5) destruction or adverse alterations of streams, wetland, tidal passes, inshore waters and waterbottoms, beaches, dunes, barrier islands, and other natural biologically valuable areas or protective coastal features;

* * *

- (8) detrimental changes in existing salinity regimes;
- (9) detrimental changes in littoral and sediment transport processes;

* * *

- (13) discharges of pathogens or toxic substances into coastal waters;

* * *

- (16) adverse alteration or destruction of unique or valuable habitats, critical habitat for endangered species, important wildlife or fishery breeding or nursery areas, designated wildlife management or sanctuary areas, or forestlands;

* * *

- (18) adverse disruptions of coastal wildlife and fishery migratory patterns;
- (19) land loss, erosion, and subsidence;
- (20) increases in the potential for flood, hurricane and other storm damage, or increase in the likelihood that damage will occur from such hazards;
- (21) reduction in the long term biological productivity of the coastal ecosystem.

27.

On information and belief, at least some of the activities of Defendants described above may have been permitted and/or authorized by the Louisiana Department of Natural Resources, Office of Conservation (hereinafter, the “**LDNR-OC**”). Paragraph B of La. R.S. 49:214.31

states that “[p]ermits issued pursuant to existing statutory authority of the office of conservation in the Department of Natural Resources for the location, drilling, exploration and production of oil, gas, sulfur or other minerals shall be issued in lieu of coastal use permits, provided that the office of conservation shall coordinate such permitting actions pursuant to R.S. 49:214.31(B) and (D) and **shall ensure that all activities so permitted are consistent with the guidelines, the state program and any affected local program.**” (Emphasis added). The *Memorandum of Understanding Between the Coastal Management Section of the Department of Natural Resources and the Office of Conservation of the Department of Natural Resources*, dated July 8, 1980, reinforces section La. R.S. 49:214.31, wherein it states that the LDNR-OC “will issue in-lieu permits only if the proposed activity is consistent with the Coastal Use Guidelines, the Louisiana Coastal Resources Program and affected approved local programs.”

28.

To the extent that Defendants operated or conducted activities in the Operational Area under “in lieu” permits authorized or granted by the LDNR-OC or another state agency, Defendants were obligated to comply fully with the CZM Laws in the conduct of such operations or activities.

29.

Furthermore, Plaintiffs allege that most, if not all, of Defendants’ operations or activities complained of herein were not “lawfully commenced or established” prior to the implementation of the coastal zone management program. *See* LAC 43:723(B)(8). The complained-of operations and activities were prohibited prior to 1978 by various provisions of Louisiana Statewide Orders 29, 29-A, and 29-B, various field wide orders, as well as various orders of the Louisiana Stream Control Commission.

30.

Defendants are required to comply not only with all applicable state environmental laws and state regulations, but also with any additional requirements imposed by the State of Louisiana or Cameron Parish through the coastal zone management program. Defendants have

failed to comply with numerous provisions of the state coastal zone management program, as previously alleged, and thus they are liable under the CZM Laws for any damages resulting from these violations.

31.

The Defendants are liable for the foregoing violations of the state and local CZM Laws, including without limitation, the failure to clear, revegetate, detoxify, and restore to their original condition those portions of the Cameron Parish Coastal Zone affected by Defendants' activities within the Operational Area.

32.

The damages, costs, and attorney fees provided by La. R.S. 49:214.36 are in addition to any fine, forfeiture, other penalty, or costs imposed under any other provision of law.

33.

Notwithstanding any allegations or language to the contrary contained elsewhere in this petition, Plaintiffs expressly limit the scope of the claims and allegations of this petition as follows:

(a) Plaintiffs allege only those state law causes of action that they have a right to pursue under La. R.S. 49:214.21, *et seq.*, as amended, and the state and local regulations, guidelines, ordinances and orders promulgated pursuant thereto and consistent therewith;

(b) Plaintiffs have not pled, and will never at any time in the future plead, any claim or cause of action arising under federal law or federal regulations, and assert no such claims herein; Plaintiffs allege no claims subject to federal question jurisdiction; Plaintiffs do not pursue or allege any claims or causes of action arising under federal common law;

(c) To the extent any state law claims alleged in this petition are preempted by federal law, such claims are not alleged herein;

(d) Plaintiffs do not pursue or allege any claims that have been discharged in bankruptcy;

(e) Plaintiffs do not pursue or allege any claims “arising under the Constitution, laws, or treaties of the United States”;

(f) Plaintiffs do not allege or pursue any claims wherein their right to relief under any cause of action necessarily depends on a resolution of a substantial, disputed question of federal law;

(g) Plaintiffs do not allege or pursue any claims arising under the Rivers and Harbors Act of 1899, as amended, or any regulations issued pursuant thereto (hereinafter, collectively, the “RHA”), and do not pursue or allege any claims arising under any U.S. Army Corps of Engineers regulations or permits;

(h) Plaintiffs do not pursue or allege any claims arising under the Clean Water Act of 1972, as amended, or any regulations issued pursuant thereto (hereinafter, collectively, the “CWA”);

(i) Plaintiffs do not pursue or allege any claims arising under any federal regulations;

(j) Plaintiffs do not allege or pursue any claim that any Defendant violated a federal permit or failed to obtain a federal permit;

(k) Plaintiffs do not allege that they are third party beneficiaries of any obligation between Defendants and any governmental body, or that they are third party beneficiaries of any permitting scheme;

(l) Plaintiffs do not allege that they are third party beneficiaries of any permit, contract, or right of way agreement, or other conventional servitude or servitude imposed by law;

(m) Plaintiffs do not allege that they have the right to enforce a federal permit as a third party beneficiary;

(n) Plaintiffs do not allege that they represent any class; further, Plaintiffs do not pursue or allege any claim over which there is CAFA jurisdiction of this case; Plaintiffs bring this action only on their own behalf and not on behalf of any class or group of individuals or legal entities.

(o) Plaintiffs do not allege that any acts, omissions, operations or activities occurring on the Outer Continental Shelf violated the CZM Laws. None of the acts, omissions, operations or activities that form the basis of the Plaintiffs' claims in this petition involve operations or activities on the Outer Continental Shelf. Plaintiffs do not pursue or allege any claim arising under the Outer Continental Shelf Lands Act (the "OCSLA") (43 U.S.C. § 1331 *et seq.*); Plaintiffs do not pursue or allege any claim subject to the jurisdiction of the OCSLA; further, Plaintiffs do not pursue or allege any claim within the jurisdiction established by 43 U.S.C. § 1349;

(p) Plaintiffs do not pursue or allege any claim for activities conducted on a federal enclave or for damage to a federal enclave, and do not pursue or allege any claims regarding any land held in trust by the federal government, its officers, agencies, or agents; Plaintiffs do not pursue or allege any claims over which the federal government contests title. Plaintiffs do not pursue or allege any claims for damages to any federal floodwalls, federal levees, or any other federal installations or properties. Plaintiffs do not allege that any event, activity, or claim pursued in this petition occurred on a federal enclave. Plaintiffs do not allege or pursue any claim for an alleged injury in circumstances where the alleged injury arose on a federal enclave and the injury is indivisible from an injury that did not occur on a federal enclave.

(q) Plaintiffs make no claims under Louisiana tort law, contract law, mineral law, or property law;

(r) Plaintiffs do not allege or pursue any claims that are: (1) covered by or subject to the jurisdiction of the All Writs Act, 28 U.S.C. § 1651, *et seq.*, as amended; or, (2) covered by or subject to the jurisdiction of the Convention on the Recognition of Foreign Arbitral Awards,

9 U.S.C. §201, et seq., as amended. Plaintiffs do not allege or pursue any claims under the federal Oil Pollution Act of 1990, as amended;

(s) Plaintiffs do not allege any claim or cause of action arising under the federal Natural Gas Act, 15 U.S.C. 717 – 717w.

(t) In summary, Plaintiffs limit the claims asserted in this petition to state law claims arising under the CZM Laws. The attachment of the map of the entire Louisiana Coastal Zone (See Exhibit A) or the attachment of any other exhibits to this petition shall in no way be interpreted as an expansion of the scope of the specific state law claims alleged in this petition. With regard to any permit alleged in this petition to have been violated, the inclusion of language in such permit referring to federal laws or federal regulations shall in no way be interpreted as an expansion of the scope of the specific state law claims alleged in this petition. Any allegation in this petition that any defendant has violated a coastal use permit shall not be construed as an allegation that plaintiffs have alleged federal causes of action based on the violation of any federal law or regulation generally or specifically referenced in the permit or any application therefor. Further, to the extent the CZM Laws contain any citation of or reference to any federal laws, statutes or regulations, no claims or causes of action are alleged under those federal laws, statutes or regulations. Any allegation in this petition that any defendant has violated the CZM Laws shall not be construed as an allegation of a federal cause of action based on the violation of federal laws, statutes or regulations referenced in the CZM Laws. The quotation or reference in this petition to provisions of certain CZM Laws concerning “uses” of national or regional concern shall not be construed as an allegation that Plaintiffs are making claims arising under the Constitution, laws, or treaties of the United States. The use of the term “navigation” or such similar terms in the CZM Laws shall not be construed to imply that Plaintiffs are asserting maritime or admiralty claims.

(u) Plaintiffs do not plead any claim or cause of action pertaining to private property located within the Cameron Parish Coastal Zone: (1) that is the subject of any present or future demand for environmental restoration or remediation, regardless of whether the relief demanded is specific performance, damages or a mandatory or prohibitive injunction; or, (2) that is the

subject of any pending or future litigation under Act 312 of 2006 (La. R.S. 30:29, *et seq.*, as amended). Plaintiffs do not seek injunctive relief. Further, Plaintiffs do not plead any claims related to any pending environmental statutory or regulatory claims or actions filed or taken by any federal agency, including, but not limited to, the Environmental Protection Agency and the U.S. Army Corps of Engineers.

34.

Subject to all of the limitations set forth in this petition, including, but not limited to, paragraph 33, Plaintiffs Parish of Cameron and the State of Louisiana claim all damages and remedies appropriate under the CZM Laws, including, but not limited to, restoration and remediation costs; actual restoration of disturbed areas to their original condition; costs necessary to clear, revegetate, detoxify and otherwise restore the affected portions of the Cameron Parish Coastal Zone as near as practicable to its original condition pursuant to LAC 43:I.705.N, 711.F and 719.M; declaratory relief in circumstances where such relief is required, in addition to money damages, to accomplish the purposes of La. R.S. 49:214.21 *et seq.*; costs and expenses of litigation, including costs of environmental assessments and expert costs, and reasonable attorney's fees; and all other damages or remedies provided for in La. R.S. 49:214.21, *et seq.*

35.

Plaintiffs allege that the damage caused by defendant's complained-of activities within the Operational Area resulted from the defendants' violation of coastal use permits *and* from unpermitted uses of the coastal zone. Plaintiffs' claims are limited to the civil remedies provided for in La. R.S. 49:214.36; plaintiffs do not assert claims for any criminal or quasi-criminal remedies set forth in La. R.S. 49:214.36.

36.

Plaintiffs allege that defendants are *solidarily* liable for the damage caused by defendant's complained-of activities within the Operational Area. The CZM Laws render the defendants liable for the cumulative impacts of their permit and regulatory violations. While the individual defendants may have acted independently of each other in certain circumstances, their

statutory, regulatory and permit violations resulted in “cumulative impacts” to the area of the coastal zone damaged by defendant’s complained-of activities within the Operational Area. “Cumulative Impacts” are defined in La. Admin. Code tit. 43, pt. I, § 700 as “impacts increasing in significance due to the collective effects of a number of activities.” La. Admin. Code. tit. 43, pt. I, § 701 states that the “likelihood of, and extent of impacts of, resulting secondary impacts and cumulative impacts” “shall be utilized by the permitting authority in evaluating whether the proposed use is in compliance with the guidelines,” and that “all uses and activities shall be planned, sited, designed, constructed, operated, and maintained to avoid to the maximum extent practicable significant” “adverse effects of cumulative impacts.” The defendants’ unpermitted uses of the coastal zone the defendants’ violations of coastal use permits resulted in “cumulative impacts” to area of the coastal zone damaged by defendant’s complained-of activities within the Operational Area. Such damage could have been avoided had defendants followed the statutory and regulatory requirements of the CZM Laws. Further, the restoration requirements set forth in La. R.S. 49:214.36 D and E cannot be accomplished by ignoring the combined effects of multiple violations of the CZM Laws. La. R.S. 49:214.36 (E) provides for a “restoration” remedy that is “feasible and practical.” Restoration objectives must respond to environmental impacts caused by the cumulative effects of oil and gas operations. Both the CZM Laws and the LDNR Coastal Management Division’s standard operating procedures recognize the need to evaluate the cumulative and compound impacts of defendants’ violations. The statute mandating the development of the state’s master plan states: “The task of... restoring and developing a sustainable coastline will require implementation of a holistic, comprehensive engineering plan...” See La. R.S. 49:214.4.1(A)(3).

La. C. C. art. 1815 provides that an obligation is indivisible when the object of the performance is “not susceptible of division.” Indivisible obligations are subject to the rules governing solidarity. La. C.C.P. art. 1818. Under Louisiana law, if the consecutive and/or concurrent wrongful acts of defendants contribute in unknown proportions to property damage, defendants are *solidarily* liable because their obligations are indivisible.

37.

Plaintiffs demand trial by jury.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs demand judgment against Defendants (subject to the limitations set forth in this petition), as follows:

(a) Awarding damages and other appropriate relief specifically provided in the CZM Laws for violations of all applicable state coastal zone management program statutes and regulations within the Cameron Parish Coastal Zone;

(b) Ordering the payment of costs necessary to clear, revegetate, detoxify and otherwise restore the Cameron Parish Coastal Zone as near as practicable to its original condition pursuant to LAC 43:I.705.N, 711.F and 719.M.

(c) Requiring actual restoration of the Cameron Parish Coastal Zone to its original condition.

(d) Awarding reasonable costs and attorney fees.

(e) Awarding pre-judgment and post-judgment interest at the maximum rate allowable by law;

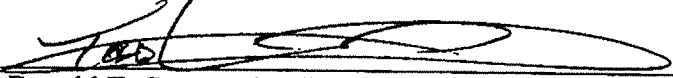
(f) Such other and further relief available in the premises, subject to the limitations set forth in the petition.

(g) Plaintiffs request trial by jury.

Respectfully submitted:

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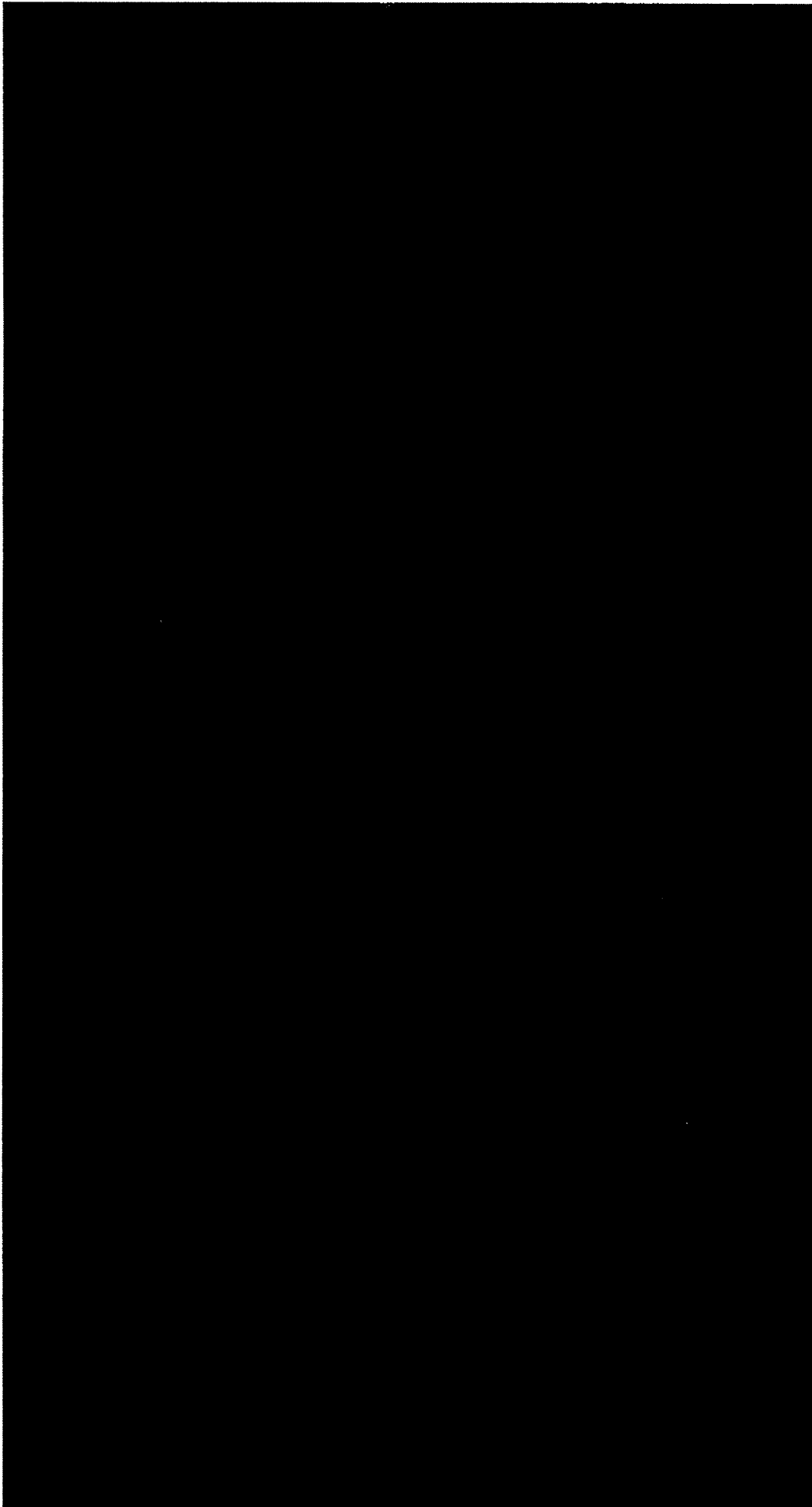
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PLEASE HOLD SERVICE

EXHIBIT A

Louisiana Coastal Zone Boundary

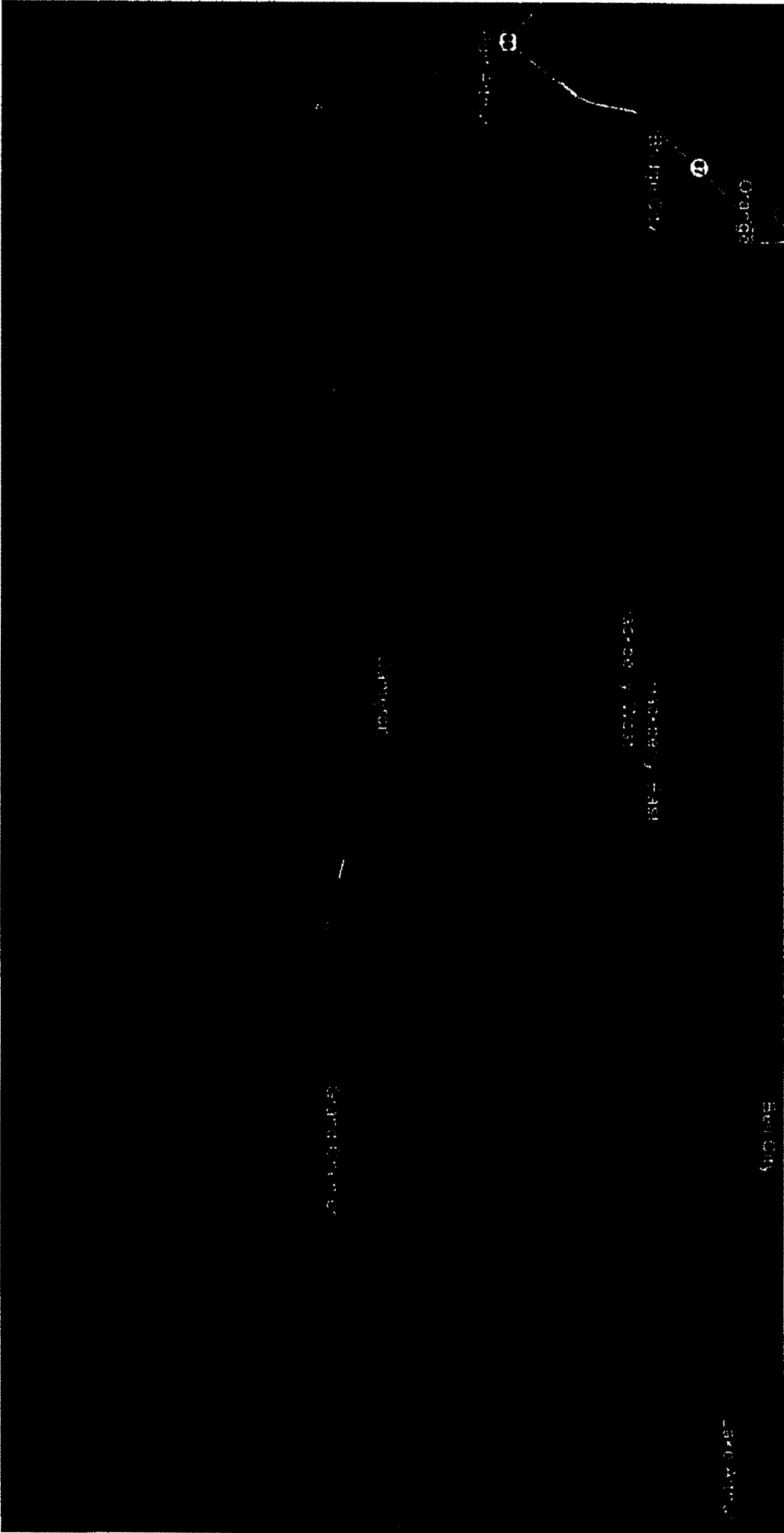


Hackberry

EXHIBIT B

Map of the Operational Area

(Overview)



Hackberry

EXHIBIT B

Map of the Operational Area

(Detail View)

2015 Aerial

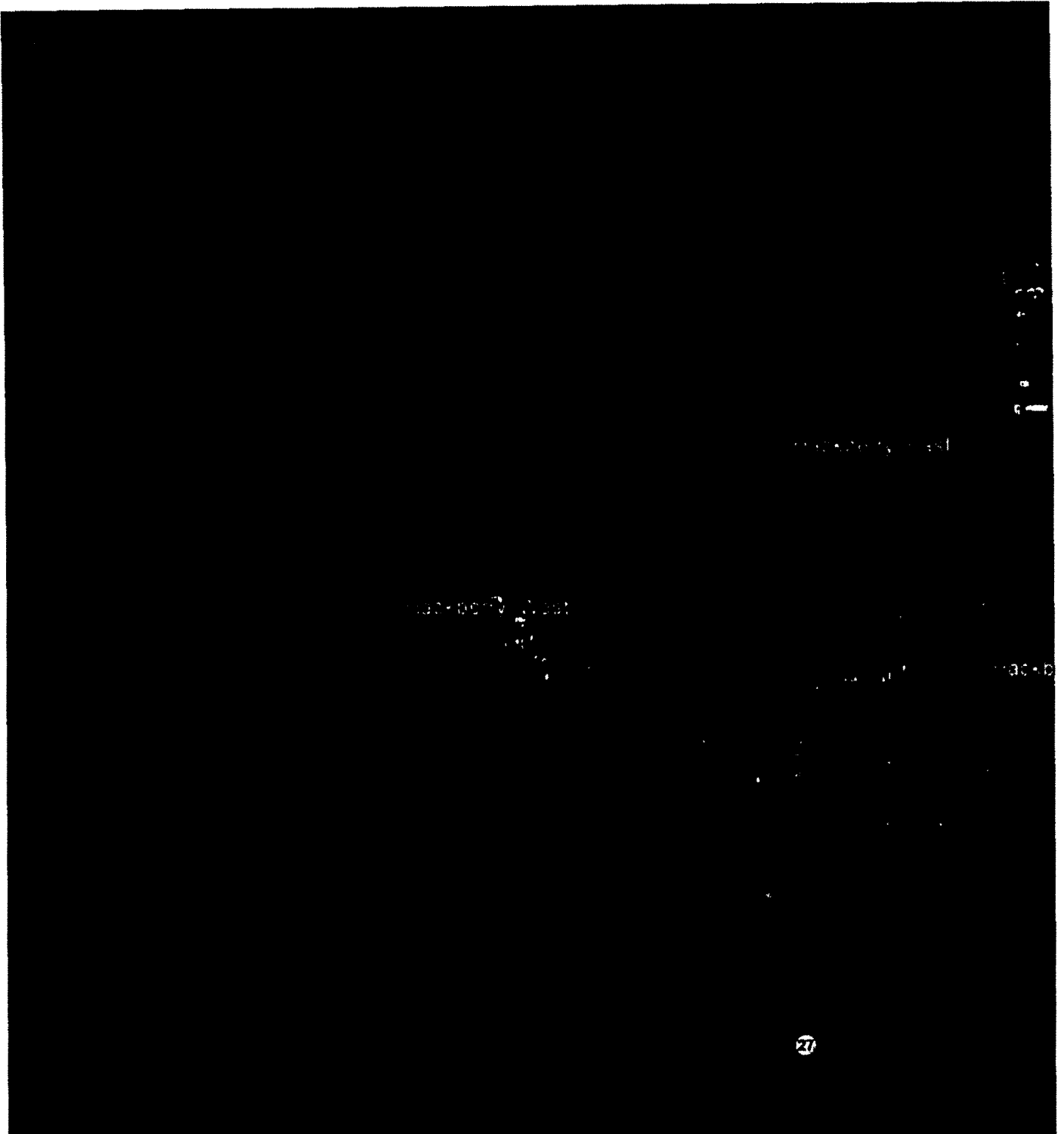


EXHIBIT C

Map of Coastal Use Permits within the Operational Area

Yellow and orange shapes represent work locations described in Coastal Use Permits.
Source: LDNR

2015 Aerial

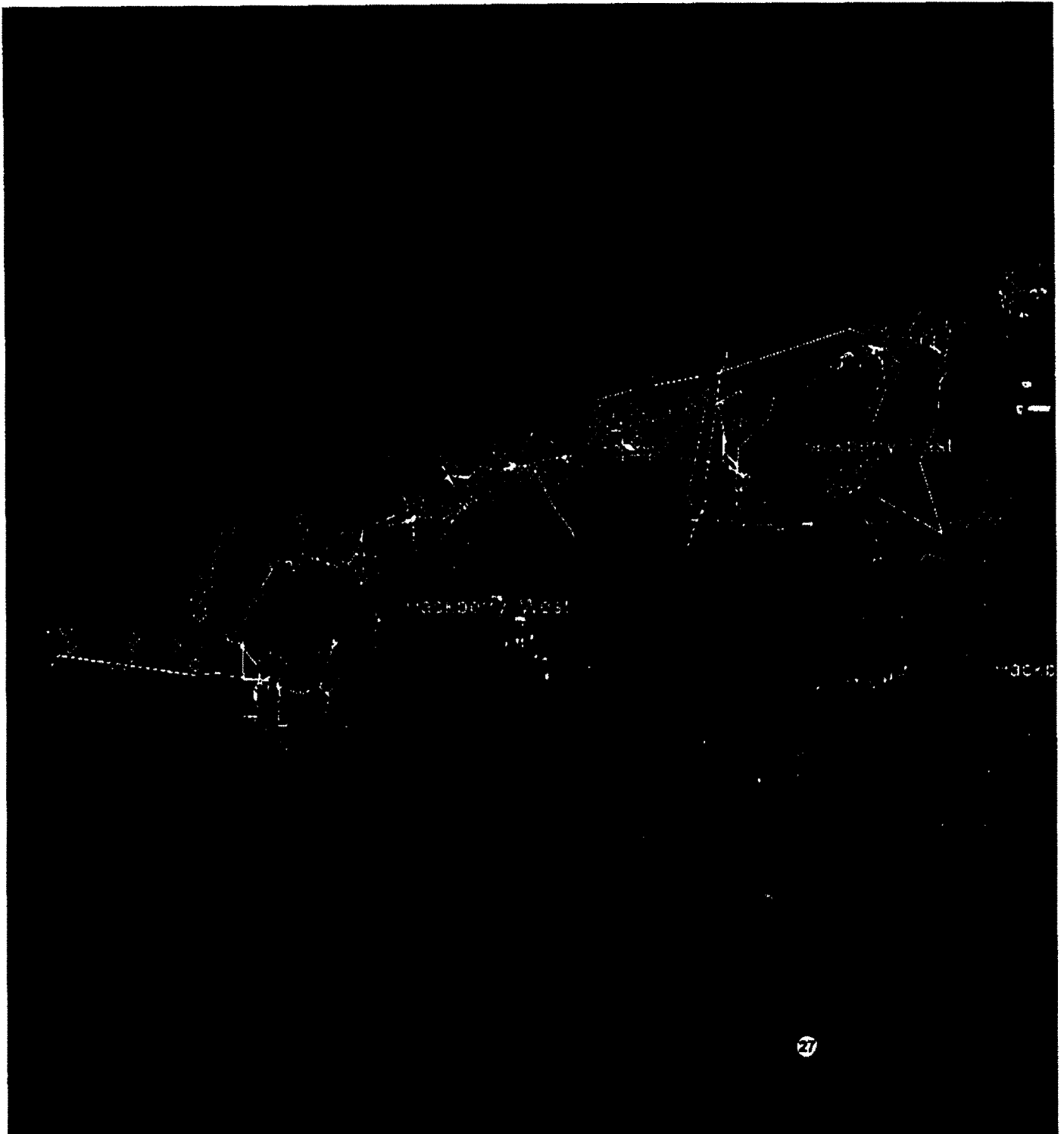


EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

| CUP No. | Description |
|-----------|--|
| P19800103 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // BURIED 5 FT MINIMUM // // Begin: STAB NO 11 // End: SL 42 WELL NO 174 // Status: Authorization Granted - Special Conditions |
| P19800103 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // BURIED 5 FT MINIMUM // // Begin: STAB NO 12 // End: SL 42 WELL NO 170 // Status: Authorization Granted - Special Conditions |
| P19800103 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // BURIED 5 FT MINIMUM // // Begin: STAB NO 12 // End: SL 42 WELL NO 172 // Status: Authorization Granted - Special Conditions |
| P19800103 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // BURIED 5 FT MINIMUM // // Begin: STAB NO 12 // End: SL 42 WELL NO 173 // Status: Authorization Granted - Special Conditions |
| P19800103 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // BURIED 5 FT MINIMUM // // Begin: STAB NO 12 // End: SL 42 WELL NO 175 // Status: Authorization Granted - Special Conditions |
| P19800103 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // BURIED 5 FT MINIMUM // // Begin: STAB NO 11 // End: SL 42 WELL NO 171 // Status: Authorization Granted - Special Conditions |
| P19800103 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // BURIED 5 FT MINIMUM // // Begin: STAB NO 11 // End: SL 42 WELL NO 174 // Status: Authorization Granted - Special Conditions |
| P19800103 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // BURIED 5 FT MINIMUM // // Begin: STAB NO 12 // End: SL 42 WELL NO 170 // Status: Authorization Granted - Special Conditions |
| P19800103 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // BURIED 5 FT MINIMUM // // Begin: STAB NO 12 // End: SL 42 WELL NO 172 // Status: Authorization Granted - Special Conditions |
| P19800103 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // BURIED 5 FT MINIMUM // // Begin: STAB NO 12 // End: SL 42 WELL NO 173 // Status: Authorization Granted - Special Conditions |
| P19800103 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // BURIED 5 FT MINIMUM // // Begin: STAB NO 12 // End: SL 42 WELL NO 175 // Status: Authorization Granted - Special Conditions |
| P19800103 | SL 42 WELL NO 170 |
| P19800103 | SL 42 WELL NO 171 |
| P19800103 | SL 42 WELL NO 172 |
| P19800103 | SL 42 WELL NO 173 |
| P19800103 | SL 42 WELL NO 174 |
| P19800103 | SL 42 WELL NO 175 |
| P19800367 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // BURIED 5 FT MINIMUM // // Begin: WELL 24 // End: TANK BATTERY 14 // Status: Authorization Granted - Special Conditions |
| P19800367 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // BURIED 5 FT MINIMUM // // Begin: WELL 24 // End: TANK BATTERY 14 // Status: Authorization Granted - Special Conditions |

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

| Permit No. | Description |
|------------|--|
| P19810403 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" // 3' - 5' BLW ML // // Begin: SL 42 WELL #176 // End: STAB #13 // Status: Authorization Granted - Special Conditions |
| P19810403 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" // 3' - 5' BLW ML // // Begin: SL 42 WELL #176 // End: STAB #13 // Status: Authorization Granted - Special Conditions |
| P19810404 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" // 3' - 5' MIN BLW ML // // Begin: SL 42 WELL #178 // End: STAB #12 // Status: Authorization Granted - Special Conditions |
| P19810404 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" // 3' - 5' MIN BLW ML // // Begin: SL 42 WELL #178 // End: STAB #12 // Status: Authorization Granted - Special Conditions |
| P19810405 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" // 3' MIN BLW ML // // Begin: SL 42 WELL #179 // End: STAB #12 // Status: Authorization Granted - Special Conditions |
| P19810406 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" // 3' MIN BLW ML // // Begin: SL 42 WELL #180 // End: STAB #12 // Status: Authorization Granted - Special Conditions |
| P19810406 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" // 3' MIN BLW ML // // Begin: SL 42 WELL #180 // End: STAB #12 // Status: Authorization Granted - Special Conditions |
| P19810407 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" // 3' MIN BLW ML // // Begin: SL 42 WELL #181 // End: STAB #10 // Status: Authorization Granted - Special Conditions |
| P19810407 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" // 3' MIN BLW ML // // Begin: SL 42 WELL #181 // End: STAB #10 // Status: Authorization Granted - Special Conditions |
| P19810408 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" // 3' MIN BLW ML // // Begin: SL 42 WELL #181 // End: STAB #12 // Status: Authorization Granted - Special Conditions |
| P19810408 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" // 3' MIN BLW ML // // Begin: SL 42 WELL #181 // End: STAB #12 // Status: Authorization Granted - Special Conditions |
| P19810417 | Amoco Production Co. - Install keyway and three 2" pipelines, Black Lake |
| P19810418 | AMOCO PRODUCTON COMPANY - 3 FLOWLINES // 3 2" FLOWLINES // BURIED 5 FT MINIMUM // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19811781 | AMOCO PRODUCTON COMPANY - FLOWLINE // 12" FLOWLINE // BURIED 4 FT BELOW MUDLINE // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19811781 | AMOCO PRODUCTON COMPANY - FLOWLINE // 6" FLOWLINE // BURIED 4 FT BELOW MUDLINE // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19820304 | Gulf Oil Corp. - Construct board road and ring levee off existing shell road, 3.9 acres brackish marsh disturbed. 2 mi North of Hackberry |
| P19821379 | Transcontinental Oil Corp - Construct board road and ring levee for well, 4.8 acres brackish marsh altered. 15 mi S of Sulphur |

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

| <u>Permit No.</u> | <u>Description</u> |
|--------------------------|--|
| P19821433 | Transcontinental Oil Corp - Construct board road and drill site, 13800 cy brackish marsh dredged 15 mi S of Sulphur |
| P19821476 | AMOCO PRODUCTON COMPANY - // 2.5" FLOWLINE // BURIED 5 FT MINIMUM // // Begin: // End: // Status: Authorization Granted - No Conditions |
| P19821476 | AMOCO PRODUCTON COMPANY - // 4" FLOWLINE // BURIED 5 FT MINIMUM // // Begin: // End: // Status: Authorization Granted - No Conditions |
| P19821477 | AMOCO PRODUCTON COMPANY - // 2.5" FLOWLINE // BURIED 5 FT MINIMUM // // Begin: // End: // Status: Authorization Granted - No Conditions |
| P19821477 | AMOCO PRODUCTON COMPANY - // 4" FLOWLINE // BURIED 5 FT MINIMUM // // Begin: // End: // Status: Authorization Granted - No Conditions |
| P19821546 | Transcontinental Oil Corp - 949' board road and drill site, 15 mi south of Sulphur |
| P19830244 | Amoco Production Co. - Install and maintain flowline to production facilities, buried 5' below mud like, 170 cy spoil from dredging, Hackberry |
| P19830245 | Amoco Production Co. - Dredge slip and install keyway to drill barge mounted rig, 18950 cy brackish marsh and canal bottom excavated and deposited on slip side, Hackberry Oil Field |
| P19830545 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MINIMUM // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19830545 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MINIMUM // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19830564 | Amoco Production Co. - Dredge and install keyway to drill with barge mounted rig, 23420 cy brackish marsh and canal bottom excavated, CPSB |
| P19830566 | Amoco Production Co. - Dredge and install keyway to drill with barge mounted rig, 6875 cy brackish marsh and canal bottom excavated, CPSB |
| P19830567 | Amoco Production Co. - Dredge and install keyway to drill with barge mounted rig, 5415 cy brackish marsh and canal bottom excavated, Gulf Land |
| P19830568 | Amoco Production Co. - Dredge and install keyway to drill with barge mounted rig, 7700 cy brackish marsh and canal bottom excavated, Gulf Land |
| P19830569 | Amoco Production Co. - Dredge and install keyway to drill with barge mounted rig, 7700 cy brackish marsh and canal bottom excavated, Gulf Land |
| P19830584 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: STAB TANK BATTERY#9 // End: S/L 42 WELL#179 // Status: Authorization Granted - No Conditions |
| P19830585 | AMOCO PRODUCTON COMPANY - 3 FLOWLINES // 2 4" & 1 2.5" FLOWLINES // BURIED 5 FT MINIMUM // // Begin: // End: // Status: Authorization Granted - No Conditions |
| P19830648 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MINIMUM // // Begin: // End: // Status: Authorization Granted - No Conditions |
| P19830648 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MINIMUM // // Begin: // End: // Status: Authorization Granted - No Conditions |
| P19830649 | Amoco Production Co. - Dredging 8800 cy fresh marsh for slip parallel to existing canal CPSB |

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

| Permit No. | Description |
|-------------------|---|
| P19830871 | Amoco Production Co. - Install keyway with barge mounted rig and 106 cy of spoil, Hackberry |
| P19830872 | Amoco Production Co. - Install and maintain drilling barge, platform, dredge 360 cy for pipelines, Black Lake |
| P19830923 | Amoco Production Co. - 17190 cy brackish marsh excavated and deposited in marsh habitat to construct oil and gas slip, 2 mi NW of Hackberry |
| P19830949 | Amoco Production Co. - Dredge slip and install keyway to drill barge mounted rig. 24440 cy lake bottom excavated and deposited on slip side, E of Black Lake on CPSB |
| P19831109 | AMOCO PRODUCTON COMPANY - FLOWLINES // 2.5" & 4.5" FLOWLINES // LAID ON MARSH & BURIED 5 FT MIN BELOW CANAL // // Begin: // End: // Status: Authorization Granted - No Conditions |
| P19831110 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 5' MINIMUM // // Begin: // End: // Status: Authorization Granted - No Conditions |
| P19831111 | AMOCO PRODUCTON COMPANY - 2 FLOWLINES // 2.5" & 4.5" FLOWLINES // LAID ON MARSH & BURIED 5 FT MIN BELOW CANALS // // Begin: // End: // Status: Authorization Granted - No Conditions |
| P19831188 | AMOCO PRODUCTON COMPANY - 2 FLOWLINES // 2.5" & 4.5" FLOWLINES // LAID ON MARSH & BURIED 5 FT MIN BELOW CANALS // // Begin: // End: // Status: Authorization Granted - No Conditions |
| P19831189 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MINIMUM // // Begin: // End: // Status: Authorization Granted - No Conditions |
| P19831189 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 5' MINIMUM // // Begin: // End: // Status: Authorization Granted - No Conditions |
| P19831281 | AMOCO PRODUCTON COMPANY - 3 FLOWLINES // 2 4" & 1 2.5" FLOWLINES // BURIED 5 FT MINIMUM // // Begin: // End: // Status: Authorization Granted - No Conditions |
| P19831384 | AMOCO PRODUCTON COMPANY - 2 FLOWLINES // 2.5" & 4.5" FLOWLINES // LAID ON MARSH & BURIED 5 FT MIN BELOW CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19831385 | AMOCO PRODUCTON COMPANY - 2 FLOWLINES // 2.5" & 4.5" FLOWLINES // LAID ON MARSH & BURIED 5 FT MIN BELOW CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19831386 | AMOCO PRODUCTON COMPANY - 2 FLOWLINES // 2.5" & 4.5" FLOWLINES // LAID ON MARSH & BURIED 5 FT MIN BELOW CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19831530 | Vernon E. Faulconer, Jr - Construct drillsite and pit area adjacent to existing road, 4360 cy fill required, 16 mi S of Sulphur |
| P19831648 | Albert J. Smith - Constructing long wharf extending outward into Atchafalaya River with mooring pilings, 1/2 mi S of Southern Pacific Railroad bridge |
| P19831708 | Amoco Production Co. - Dredge 24535 cy open water bottom material to deposit in shallow open water to construct slip; West Hackberry oil field |
| P19831719 | Amoco Production Co. - Dredge 22790 cy brackish marsh material and deposit into marsh habitat in construction of slip; East Hackberry field |

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

| <u>Permit No.</u> | <u>Description</u> |
|--------------------------|---|
| P19831720 | Amoco Production Co. - Dredge slip and construct keyway in shallow open water area; 24320 cy spoil material deposited on slip; East Hackberry field |
| P19840028 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // LAID ON SURFACE & BURIED 5 FT BELOW CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19840028 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // LAID ON SURFACE & BURIED 5 FT BELOW CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19840193 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MINIMUM BELOW LAKE BOTTOM // // Begin: // End: // Status: Authorization Granted - No Conditions |
| P19840193 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MINIMUM BELOW LAKE BOTTOM // // Begin: // End: // Status: Authorization Granted - No Conditions |
| P19840194 | Amoco Production Co. - Install keyway to drill oil or gas well with barge mounted rig, canal will be swept for Gulf Land "D" r/a/ "A" Well no. 46 |
| P19840195 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' BELOW LAKE BOTTOM // // Begin: // End: // Status: Authorization Granted - No Conditions |
| P19840195 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' BELOW LAKE BOTTOM // // Begin: // End: // Status: Authorization Granted - No Conditions |
| P19840209 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' BELOW LAKE BOTTOM // // Begin: // End: // Status: Authorization Granted - No Conditions |
| P19840209 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' BELOW LAKE BOTTOM // // Begin: // End: // Status: Authorization Granted - No Conditions |
| P19840220 | **Documents not available. |
| P19840759 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANAL // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19840759 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANAL // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19840771 | Amoco Production Co. - dredge ~19,079 yd.^3 of open water bottom to construct 378' x 235' x 8' oil/gas slip; excavated material to be placed on existing spoil banks and spread in open water; S11, T12S-R10W |
| P19840772 | Amoco Production Co. - West Hackberry Field; Install a keyway to drill oil/gas well with barge mounted rig; S16, T12S-R10W |
| P19840773 | Amoco Production Co. - West Hackberry Field; Install a keyway to drill oil/gas well with barge mounted rig; S16, T12S-R10W |
| P19840940 | Darsey Operating Co. - dredge ~8,667 yd.^3 and deposit to form ring levee and raise oil/gas drilling well pad; S13, T12S-R10W ~1.2 miles N Hackberry |
| P19841114 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions |

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

| Permit No. | Description |
|-------------------|---|
| P19841114 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19841115 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19841115 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19841116 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19841116 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19841117 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19841117 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19841126 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19841126 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19841127 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19841127 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19841128 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19841128 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19841129 | Amoco Production Co. - S16, T12S-R10W; proposal to drill with barge mounted rig and lay flowlines, W. Hackberry Field |
| P19841178 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19841178 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19841209 | Amoco Production Co. - barge mounted rig and lay flowlines; S10, T12S-R10W |

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

| Permit No | Description |
|-----------|--|
| P19841210 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#191 // End: STAB TANK BATTERY#11 // Status: Authorization Granted - No Conditions |
| P19841210 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#191 // End: STAB TANK BATTERY#11 // Status: Authorization Granted - No Conditions |
| P19841524 | Amoco Production Co. - Install pumping unit in West Hackberry Field |
| P19841604 | DREDGING3 |
| P19850082 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#193 // End: STAB TANK BATTERY#12 // Status: Authorization Granted - No Conditions |
| P19850082 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#193 // End: STAB TANK BATTERY#12 // Status: Authorization Granted - No Conditions |
| P19850085 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#192 // End: STAB TANK BATTERY#12 // Status: Authorization Granted - No Conditions |
| P19850085 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#192 // End: STAB TANK BATTERY#12 // Status: Authorization Granted - No Conditions |
| P19850241 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19850241 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19850242 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19850242 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // LAID ON MARSH & BURIED 5 FT AT CANALS // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19850243 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE, ACROSS SPOIL BANKS // // Begin: GULF LAND "A" R/A "C" WELL#237 // End: STAB TANK BATTERY#19 // Status: Authorization Granted - Special Conditions |
| P19850243 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE, ACROSS SPOIL BANKS // // Begin: GULF LAND "A" R/A "C" WELL#237 // End: STAB TANK BATTERY#19 // Status: Authorization Granted - Special Conditions |
| P19850329 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#194 // End: STAB TANK BATTERY#9 // Status: Authorization Granted - Special Conditions |
| P19850329 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#194 // End: STAB TANK BATTERY#9 // Status: Authorization Granted - Special Conditions |

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

| CUP No. | Description |
|----------------|--|
| P19850410 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BELOW MUDLINE // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19850410 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 5' MIN BELOW MUDLINE // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19850411 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#195 // End: STAB TANK BATTERY#7 // Status: Authorization Granted - Special Conditions |
| P19850411 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#195 // End: STAB TANK BATTERY#7 // Status: Authorization Granted - Special Conditions |
| P19850423 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // LAID ACROSS MARSH // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19850423 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // LAID ACROSS MARSH // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19850447 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' BELOW MUDLINE, 3104.5' LAID ACROSS MARSH // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19850447 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 5' BELOW MUDLINE, 3104.5' LAID ACROSS MARSH // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19850561 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // SRF OF SPL BNK, 5' BLW SLIP BTM & CANAL X // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19850561 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // SRF OF SPL BNK, 5' BLW SLIP BTM & CANAL X // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19850656 | Amoco Production Co. - Construct ring levee, road dump, and road ramp to drill well; W Hackberry Field |
| P19850657 | Amoco Production Co. - Lay flowlines for well; W Hackberry |
| P19850677 | Amoco Production Co. - Excavate 133 cy levee material as backfill for restoring old oil and gas waste pit; pit contents to be hauled to approved disposal site; W Hackberry Gas Injection System |
| P19850698 | Amoco Production Co. - Drill well from existing keyway with barge mounted inland drilling rig; W Hackberry area |
| P19850708 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#197 // End: STAB TANK BATTERY#11 // Status: Authorization Granted - No Conditions |
| P19850708 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#197 // End: STAB TANK BATTERY#11 // Status: Authorization Granted - No Conditions |
| P19850709 | Amoco Production Co. - Install keyway to drill oil or gas well with barge mounted rig, and lay flowlines; W Hackberry Field |

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

| CUP No. | Description |
|----------------|--|
| P19850724 | AMOCO PRODUCTION COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' BELOW MUDLINE // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19850724 | AMOCO PRODUCTION COMPANY - FLOWLINE // 4.5" FLOWLINE // 5' BELOW MUDLINE // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19850815 | AMOCO PRODUCTION COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BELOW SLIP AND CANAL // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19850815 | AMOCO PRODUCTION COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BELOW SLIP AND CANAL // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19850816 | Amoco Production Co. - Install a keyway and drill with barge mounted drilling rig; West Hackberry Field |
| P19850821 | AMOCO PRODUCTION COMPANY - FLOWLINE // 4" FLOWLINE // 5' BLW MUDLINE // // Begin: STAB TANK BATTERY#9 // End: S/L 42 WELL#198 // Status: Authorization Granted - No Conditions |
| P19850823 | AMOCO PRODUCTION COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE, ACROSS SPOIL BANK // // Begin: GULF LAND A R/A C WELL#232 // End: STAB TANK BATTERY#5 // Status: Authorization Granted - No Conditions |
| P19850823 | AMOCO PRODUCTION COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE, ACROSS SPOIL BANK // // Begin: GULF LAND A R/A C WELL#232 // End: STAB TANK BATTERY#5 // Status: Authorization Granted - No Conditions |
| P19850824 | AMOCO PRODUCTION COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BELOW SLIP AND CANAL // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19850946 | Amoco Production Co. - Excavate 169 cy spoil and brackish marsh to widen existing canal for service access; material will be placed on bank adjacent to excavated area; E Hackberry Field |
| P19850959 | AMOCO PRODUCTION COMPANY - FLOWLINE // 4" FLOWLINE // 5' BELOW MUDLINE // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19850960 | AMOCO PRODUCTION COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#200 // End: STAB TANK BATTERY#12 // Status: Authorization Granted - Permit Withdrawn |
| P19850985 | AMOCO PRODUCTION COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' BLW CANAL & SLIP BTM // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19850985 | AMOCO PRODUCTION COMPANY - FLOWLINE // 4" FLOWLINE // 5' BLW CANAL & SLIP BTM // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19850986 | AMOCO PRODUCTION COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' BLW SLIP & CANAL MUDLINE, BY BACKFILL // // Begin: // End: // Status: Authorization Granted - Special Conditions |

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

| GUP No. | Description |
|----------------|--|
| P19850986 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' BLW SLIP & CANAL MUDLINE, BY BACKFILL // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19851007 | Amoco Production Co. - Fill existing borrow pit and overlay with limestone to construct parking lot and service area; 1512 cy clean fill used and 1674 cy to level; 2 mi N of Hackberry |
| P19851028 | MARSH MANAGEMENT PLAN AREA |
| P19851028 | Removed |
| P19851028 | SPOIL1 |
| P19851049 | Amoco Production Co. - Construct ring levee, road ramp and drill pad; 5835 cy used; West Hackberry Field |
| P19851050 | Amoco Production Co. - Lay flowlines for the Gulf Land D R/A A #50; West Hackberry |
| P19851051 | Amoco Production Co. - Level location, overlay with shell, construct support structures, lay piping tie-ins to create a fuel gas expander plant; West Hackberry Field |
| P19851053 | Amoco Production Co. - Install an addition to existing keyway to drill with barge mounted drilling rig; West Hackberry Field |
| P19851087 | Amoco Production Co. - Lay flowlines; East Hackberry |
| P19851117 | Amoco Production Co. - Install pipe bents on existing spoil banks to elevate flowlines; West Hackberry |
| P19851162 | Amoco Production Co. - Install keyway to drill with barge mounted drilling rig; West Hackberry |
| P19851249 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#197 // End: STAB TANK BATTERY#9 // Status: Authorization Granted - No Conditions |
| P19851249 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#197 // End: STAB TANK BATTERY#9 // Status: Authorization Granted - No Conditions |
| P19851250 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE, ACROSS SPOIL BANK // // Begin: CAMERON PH SCHL BRD R/A C WELL#55 // End: STAB TANK BATTERY#14 // Status: Authorization Granted - Special Conditions |
| P19851251 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' BLW MUDLINE // // Begin: STAB TANK BATTERY#9 // End: S/L 42 WELL#201 // Status: Authorization Granted - No Conditions |
| P19851252 | Amoco Production Co. - Install keyway to drill w/barge mounted drilling rig; no dredging; West Hackberry Field |
| P19851253 | Amoco Production Co. - Install keyway; no dredging; West Hackberry Field |
| P19851334 | Amoco Production Co. - Install keyway; no dredging; West Hackberry Field |
| P19851335 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#202 // End: STAB TANK BATTERY#12 // Status: Authorization Granted - No Conditions |
| P19851335 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#202 // End: STAB TANK BATTERY#12 // Status: Authorization Granted - No Conditions |

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

| Permit No. | Description |
|------------|--|
| P19851363 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: GULF LAND A R/A C WELL#244 // End: STAB TANK BATTERY#5 // Status: Authorization Granted - Special Conditions |
| P19851363 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: GULF LAND A R/A C WELL#244 // End: STAB TANK BATTERY#5 // Status: Authorization Granted - Special Conditions |
| P19851423 | Amoco Production Co. - Install keyway & lay flowlines; East Hackberry Field |
| P19851442 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // ACROSS MARSH, 5' BELOW MUDLINE AT SLIP // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19851442 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // ACROSS MARSH, 5' BELOW MUDLINE AT SLIP // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19851468 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#200 // End: STAB TANK BATTERY#13 // Status: Authorization Granted - No Conditions |
| P19851507 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 3' BLW ML OPEN WATER, 10' BLW NATURAL WATER BODIES // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19851530 | Amoco Pipeline Company - 4" Pipeline replacement on canal in West Hackberry Oil Field, Sec. 14, T12S - R10W. ± 1300CY material to be deposited on spoil bank and used to backfill pipeline ditch upon completion of replacement. |
| P19851531 | Amoco Pipeline Company - Replace 2039' of 4" pipeline. ± 907 CY to be excavated banked then used as cover, temporarily disturbing ± .5 acs. brak. marsh. Sec. 19, T12S - R10W |
| P19851547 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // BURIED BY BACKFILL, 5' BELOW CANAL&SLIP // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19851547 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // BURIED BY BACKFILL, 5' BELOW CANAL&SLIP // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19851581 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // ACROSS MARSH, BURIED AT CANAL X // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19851581 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // ACROSS MARSH, BURIED AT CANAL X // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19851582 | Amoco Production Co. - Sec. 18, T12S - R10W. 230' channel & 376' X 160' slip (± 9497 CY) to D/P the Gulf Land A R/A C. Well #247, lay two flowlines of 4" & 2.5" a total length of 2168.87'. |
| P19851607 | Amoco Production Co. - Make a pipeline x-ing at the mouth of an access canal, East Hackberry Field, Sec. 14, T12S - R10W |
| P19860051 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // BURIED UNDER CANALS AND LAID ON MARSH // // Begin: // End: // Status: Authorization Granted - Special Conditions |

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

| CUP No | Description |
|---------------|---|
| P19860051 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // BURIED UNDER CANALS AND LAID ON MARSH // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19860156 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#198 // End: STAB TANK BATTERY #8 // Status: Authorization Granted - No Conditions |
| P19860261 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#203 // End: STAB TANK BATTERY#9 // Status: Authorization Granted - No Conditions |
| P19860261 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#203 // End: STAB TANK BATTERY#9 // Status: Authorization Granted - No Conditions |
| P19860351 | Amoco Production Co. - Cameron Parish School Board R/A B Well #56, Sec. 16, T12S - R10W, West Hackberry Field. Sweep existing canal to depth and width per drawings to I/M drill barge. |
| P19860384 | Amoco Production Co. - Install one 4" & one 2.5" petroleum products pipelines ($\pm 1447.32'$) to serve Cameron Parish School Board Well #56. |
| P19860402 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#205 // End: STAB TANK BATTERY#9 // Status: Authorization Granted - No Conditions |
| P19860402 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#205 // End: STAB TANK BATTERY#9 // Status: Authorization Granted - No Conditions |
| P19860403 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#204 // End: STAB TANK BATTERY#10 // Status: Authorization Granted - No Conditions |
| P19860403 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#204 // End: STAB TANK BATTERY#10 // Status: Authorization Granted - No Conditions |
| P19860464 | Amoco Production Co. - Sweep P/A existing slip to drill Cameron Parish School board A R/A C Well #57, West hackberry Field, Sec. 16, T12S - R10W. |
| P19860491 | AMOCO PRODUCTON COMPANY - // 2.5" FLOWLINE // LAID ON MARSH AND BURIED 5 FT AT CROSSINGS // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19860491 | AMOCO PRODUCTON COMPANY - // 4" FLOWLINE // LAID ON MARSH AND BURIED 5 FT AT CROSSINGS // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19860610 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#206 // End: STAB TANK BATTERY#10 // Status: Authorization Granted - No Conditions |
| P19860610 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#206 // End: STAB TANK BATTERY#10 // Status: Authorization Granted - No Conditions |
| P19860803 | Amoco Production Co. - Sweep existing canal and construct keyway to bring in drill barge to D/P the Cameron Parish School Board Well #58, West Hackberry Field, Sec.10, T12S - R10W |

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

| CUP No. | Description |
|----------------|--|
| P19860828 | AMOCO PRODUCTION COMPANY - OIL/GAS // 2.5" OIL/GAS // 5' MIN BLW MUDLINE // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19860828 | AMOCO PRODUCTION COMPANY - OIL/GAS // 4" OIL/GAS // 5' MIN BLW MUDLINE // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19860867 | AMOCO PRODUCTION COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#207 // End: STAB TANK BATTERY#11 // Status: Authorization Granted - No Conditions |
| P19860867 | AMOCO PRODUCTION COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#207 // End: STAB TANK BATTERY#11 // Status: Authorization Granted - No Conditions |
| P19860868 | AMOCO PRODUCTION COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#208 // End: STAB TANK BATTERY#10 // Status: Review complete Transferred to Consistency Section |
| P19860868 | AMOCO PRODUCTION COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#208 // End: STAB TANK BATTERY#10 // Status: Review complete Transferred to Consistency Section |
| P19860978 | Star Energy, Inc. - Star Energy - J.B. Watkins Est. #1 Well. 200' X 200' drillsite/pit area to be constructed adjacent to an existing road. A total of 3340 CY of fill will be required for the drill pad and 1300 CY for the ring levee. Located in Sec. 13, T12S - R10W. |
| P19861022 | Amoco Production Co. - Keyway and flowlines to D/P SL 42 Well#209, Sec. 17, T12S - R10W |
| P19861043 | AMOCO PRODUCTION COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#211 // End: STAB TANK BATTERY#10 // Status: Authorization Granted - No Conditions |
| P19861043 | AMOCO PRODUCTION COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#211 // End: STAB TANK BATTERY#10 // Status: Authorization Granted - No Conditions |
| P19861051 | AMOCO PRODUCTION COMPANY - OIL/GAS // 4" OIL/GAS // 5' MIN BLW MUDLINE // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19861604 | SPOIL2 |
| P19870087 | Amoco Production Co. - I/M one 4.5" and one 2.5" petroleum products pipelines to serve the Gulf Land A R/A C Well #248, West Hackberry Field, Sec. 19, T12S - R10W 437.67' in canals & 1949.53' on marsh. |
| P19870125 | AMOCO PRODUCTION COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' BLW M/L @ CANAL&X, SURFACE OF MARSH // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19870125 | AMOCO PRODUCTION COMPANY - FLOWLINE // 4.5" FLOWLINE // 5' BLW M/L @ CANAL&X, SURFACE OF MARSH // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19870134 | AMOCO PRODUCTION COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#212 // End: STAB TANK BATTERY#10 // Status: Review complete Transferred to Consistency Section |

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

| CUP No. | Description |
|-----------|--|
| P19870134 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#212 // End: STAB TANK BATTERY#10 // Status: Review complete Transferred to Consistency Section |
| P19870146 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' BLW M/L @ CANAL, SURFACE OF MARSH // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19870146 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 5' BLW M/L @ CANAL, SURFACE OF MARSH // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19870173 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#213 // End: STAB TANK BATTERY#10 // Status: Authorization Granted - No Conditions |
| P19870173 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#213 // End: STAB TANK BATTERY#10 // Status: Authorization Granted - No Conditions |
| P19870198 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' BLW LAKE BOTTOM // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19870198 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 5' BLW LAKE BOTTOM // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19870308 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#215 // End: STAB TANK BATTERY#10 // Status: Review complete Transferred to Consistency Section |
| P19870308 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#215 // End: STAB TANK BATTERY#10 // Status: Review complete Transferred to Consistency Section |
| P19870310 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // BURIED BY BACKFILL // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19870310 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // BURIED BY BACKFILL // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19870390 | Amoco Production Co. - Existing slip dredged for Gulf Land A R/A C Well #67 will be utilized for Gulf Land A R/A C Well #249. Existing slip and canals will be swept as needed under general permit issued on Nov. 14, 1980. No dredging will be required. East Hackberry Field, Sec. 12, T12S - R10W |
| P19870404 | Amoco Production Co. - Existing slip dredged for Gulf Land A R/A B Well #159 will be utilized for Gulf Land A R/A B Well #250. Existing slip and canals will be swept as needed under general permit issued on Nov. 14, 1980. No dredging will be required. East Hackberry Field, Sec. 15, T12S - R10W |
| P19870405 | Amoco Production Co. - Existing slip dredged for Gulf Land A R/A B Well #105 will be utilized for Gulf Land A R/A B Well #251. Existing slip and canals will be swept as needed under general permit issued on Nov. 14, 1980. No dredging will be required. East Hackberry Field, Sec. 15, T12S - R10W |
| P19870409 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 5' BLW SLIP&CANAL, SURFACE // // Begin: // End: // Status: Authorization Granted - Special Conditions |

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

| Permit No. | Description |
|------------|--|
| P19870429 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW BOTTOM // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19870429 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 5' MIN BLW BOTTOM // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19870430 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 5' MIN BLW BOTTOM // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19870483 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#218 // End: STAB TANK BATTERY #8 // Status: Authorization Granted - No Conditions |
| P19870484 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#217 // End: STAB TANK BATTERY#8 // Status: Authorization Granted - No Conditions |
| P19870484 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#217 // End: STAB TANK BATTERY#8 // Status: Authorization Granted - No Conditions |
| P19870485 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#216 // End: STAB TANK BATTERY#9 // Status: Authorization Granted - No Conditions |
| P19870485 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: S/L 42 WELL#216 // End: STAB TANK BATTERY#9 // Status: Authorization Granted - No Conditions |
| P19870564 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2" FLOWLINE // BURIED BY BACKFILL // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19870677 | Amoco Production Co. - Perform maintenance dredging for existing canal system; 5 mi SW of Grand Lake |
| P19870689 | Culvert |
| P19870689 | MARSH MANAGEMENT PLAN AREA |
| P19870689 | Pump |
| P19870689 | TRENASS2 |
| P19870689 | TRENASSE 4 |
| P19870694 | Amoco Production Co. - Sweep existing canal and install keyway to drill with barge-mounted rig; West Hackberry field |
| P19870698 | Amoco Production Co. - Sweep existing canal and install keyway to drill with barge-mounted rig; West Hackberry field |
| P19870737 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // LAID ON SURFACE, 5' BLW CANAL // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19870737 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // LAID ON SURFACE, 5' BLW CANAL // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19870743 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // BURIED UNDER SLIP&CANAL, LAID ON SURFACE // // Begin: // End: // Status: Authorization Granted - Special Conditions |

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

| CUP No. | Description |
|-----------|--|
| P19870743 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // BURIED UNDER SLIP&CANAL, LAID ON SURFACE // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19870910 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 3' MIN BLW MUDLINE // // Begin: // End: // Status: Authorization Granted - No Conditions |
| P19870911 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // LAID ON SURFACE, 5' MIN @ CANAL XING // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19870912 | Amoco Production Co. - Sweep existing canal and install keyway to drill with barge-mounted rig; West Hackberry field |
| P19870943 | AMOCO PRODUCTON COMPANY - POWER LINE // // BURIED BY BACKFILL // // Begin: // End: // Status: Authorization Granted - No Conditions |
| P19871079 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: // End: // Status: Review complete Transferred to Consistency Section |
| P19871079 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 5' MIN BLW MUDLINE // // Begin: // End: // Status: Review complete Transferred to Consistency Section |
| P19871128 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 3' MIN BLW MUDLINE // // Begin: // End: // Status: Authorization Granted - No Conditions |
| P19871128 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 3' MIN BLW MUDLINE // // Begin: // End: // Status: Authorization Granted - No Conditions |
| P19871232 | AMOCO PRODUCTON COMPANY - GAS LIFT LINE // 4" GAS LIFT LINE // LAID ON CATWLK, BACKFILLED, SURFACE OF MARSH // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19871286 | Amoco Production Co. - Conduct sweeping operations to utilize existing canal, install keyway to drill with barge mounted rig for CPSB well; West Hackberry Field |
| P19871289 | AMOCO PRODUCTON COMPANY - OIL/GAS // 2.5" OIL/GAS // LAID ON SURFACE, 5' MIN BLW CANAL // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19871289 | AMOCO PRODUCTON COMPANY - OIL/GAS // 4.5" OIL/GAS // LAID ON SURFACE, 5' MIN BLW CANAL // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19880313 | AMOCO PRODUCTON COMPANY - // 2.5" FLOWLINE // 5' BLW LAKE BOTTOM // // Begin: // End: // Status: Authorization Granted - No Conditions |
| P19880313 | AMOCO PRODUCTON COMPANY - // 4.5" FLOWLINE // 5' BLW LAKE BOTTOM // // Begin: // End: // Status: Authorization Granted - No Conditions |
| P19880334 | AMOCO PRODUCTON COMPANY - // 2.5" FLOWLINE // 5' BLW LAKE BOTTOM // // Begin: // End: // Status: Authorization Granted - No Conditions |
| P19880334 | AMOCO PRODUCTON COMPANY - // 4.5" FLOWLINE // 5' BLW LAKE BOTTOM // // Begin: // End: // Status: Authorization Granted - No Conditions |
| P19880342 | AMOCO PRODUCTON COMPANY - // 2.5" FLOWLINE // 5' BLW LAKE BOTTOM // // Begin: // End: // Status: Authorization Granted - No Conditions |

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

| Permit No. | Description |
|-------------------|---|
| P19880342 | AMOCO PRODUCTON COMPANY - // 4.5" FLOWLINE // 5' BLW LAKE BOTTOM // // Begin: // End: // Status: Authorization Granted - No Conditions |
| P19880348 | AMOCO PRODUCTON COMPANY - // 2.5" FLOWLINE // 5' BLW MUDLINE // // Begin: // End: // Status: Authorization Granted - No Conditions |
| P19880348 | AMOCO PRODUCTON COMPANY - // 4.5" FLOWLINE // 5' BLW MUDLINE // // Begin: // End: // Status: Authorization Granted - No Conditions |
| P19880586 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' BLW MUDLINE // // Begin: // End: // Status: Authorization Granted - No Conditions |
| P19880586 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 5' BLW MUDLINE // // Begin: // End: // Status: Authorization Granted - No Conditions |
| P19880587 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' BLW MUDLINE // // Begin: // End: // Status: Authorization Granted - No Conditions |
| P19880587 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 5' BLW MUDLINE // // Begin: // End: // Status: Authorization Granted - No Conditions |
| P19880588 | AMOCO PRODUCTON COMPANY - FLOWLINE // 2.5" FLOWLINE // 5' BLW MUDLINE // // Begin: // End: // Status: Authorization Granted - No Conditions |
| P19880588 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // 5' BLW MUDLINE // // Begin: // End: // Status: Authorization Granted - No Conditions |
| P19881133 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4.5" FLOWLINE // MARSH LEVEL, 3' MIN BLW M/L @ XING // // Begin: S.T.A.B. #21 // End: S.T.A.B. #17 // Status: Authorization Granted - Special Conditions |
| P19890242 | Amoco Production Co. - Perform maintenance dredging for existing canal system; 5 mi SW of Grand Lake |
| P19900113 | AMOCO PRODUCTON COMPANY - // 2.5" FLOWLINE // LAID ON MARSH SURFACE // // Begin: S.T.A.B. #6 FACILITIES // End: AMOCO GLAC WELL #253 // Status: Authorization Granted - Permit Withdrawn |
| P19900113 | AMOCO PRODUCTON COMPANY - // 4.5" FLOWLINE // LAID ON MARSH SURFACE // // Begin: S.T.A.B. #6 FACILITIES // End: AMOCO GLAC WELL #253 // Status: Authorization Granted - Permit Withdrawn |
| P19900180 | AMOCO PRODUCTON COMPANY - // 4.5" FLOWLINE // ON EXISTING CATWALK, 5' BLW BOAT CHANNEL // // Begin: TANK BATTERY # 5 // End: TIE IN TO EXISTING 4.5" FLOWLINE // Status: Authorization Granted - No Conditions |
| P19900279 | AMOCO PRODUCTON COMPANY - // 4.5" FLOWLINE // LAID ON MARSH // // Begin: NO. 1 WELLSITE // End: TIE-IN TO AN EXISTING 4.5" FLOWLINE // Status: Authorization Granted - No Conditions |
| P19900939 | Chevron U.S.A. Inc. - Repair abandoned East Hackberry #62 site to level surface & install temporary board mat to drill well #79, Sec. 12, T12S - R10W. 1000 CY of fill obtained from a commercial source will be hauled onto site. |
| P19901063 | Amoco Production Co. - Sweep existing drill site to D/P the Gulf Land A R/A C Well #254, West hackberry Field. |

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

| CUP No. | Description |
|----------------|--|
| P19901080 | Valley Gas Transmission, Inc. - Dredge ±250 CY of waterbottom material to lower an existing 4.5" pipeline to a depth of 6' below the mud line, then backfill. Sec. 20, T12S - R10W |
| P19901121 | Amoco Production Co. - Maintenance dredging in an existing O/G canal system.±50000 CY of water bottom material will be dredged, T12S - R11W & T12S - R11W. Specifically mentioned is, maintenance dredging, Gulf Land A R/A C Well #42, West Hackberry Field, Sec. 19, T12S - R10W. Accompanying as-built gives an average of material removed ±593 CY |
| P19901262 | AMOCO PRODUCTON COMPANY - GAS COLLECTION // 2.5" FLOWLINE // 3' MINIMUM BELOW MUDLINE // // Begin: GULF LAND A R/A C WELL NO. 254 // End: HEADER @ S.T.A.B. 6 // Status: Authorization Granted - No Conditions |
| P19901262 | AMOCO PRODUCTON COMPANY - GAS LIFT // 2.5" FLOWLINE // 3' MINIMUM BELOW MUDLINE // // Begin: RISER @ PLATFORM // End: HEADER @ S.T.A.B. 6 // Status: Authorization Granted - No Conditions |
| P19901274 | AMOCO PRODUCTON COMPANY - // 2.5" FLOWLINE // 5' MINIMUM BELOW MUDLINE // // Begin: GULF LAND D R/A A WELL NO. 49 // End: S.T.A.B. 3 // Status: Authorization Granted - Special Conditions |
| P19901274 | AMOCO PRODUCTON COMPANY - // 4.5" FLOWLINE // 5' MINIMUM BELOW MUDLINE // // Begin: GULF LAND D R/A A WELL NO. 49 // End: S.T.A.B. 3 // Status: Authorization Granted - Special Conditions |
| P19910076 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" FLOWLINE // 3'-5' BLW MUDLINE @ XING // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19910076 | AMOCO PRODUCTON COMPANY - GAS LIFT LINE // 4" GAS LIFT LINE // ABOVE GROUND, 3'-5' BLW MUDLINE @ XING // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19910106 | Culvert |
| P19910106 | DREDGE |
| P19910106 | Protection |
| P19910118 | AMOCO PRODUCTON COMPANY - FLOWLINE *REPAIR/REPLCMNT // 4.5" FLOWLINE *EMERGENCY AFTER-THE-FACT // 3' MIN BLW MUDLINE // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19910492 | AMOCO PRODUCTON COMPANY - FLARE LINE // 8" FLARE LINE // 3' MIN BLW GROUND // // Begin: EAST HACKBERRY FACILITIES // End: FLARE STACK // Status: Authorization Granted - Permit Withdrawn |
| P19910622 | Amoco Production Co. - Flare line (8") & flare stack, 658' to be laid on surface of marsh & 16' to be buried under existing road. West Hackberry Facilities, Sec. 19, T12S - R10W |
| P19910716 | AMOCO PRODUCTON COMPANY - GAS LIFT LINE // 4.5" PIPELINE // ALONG EXISTING SPOIL BANK // // Begin: EXISTING S.T.A.B. FACILITY // End: TIE-IN TO EXISTING 4.5 GAS LIFT LINE (POINT A) // Status: Authorization Granted - No Conditions |
| P19910716 | AMOCO PRODUCTON COMPANY - OIL & WATER DUMP LINE // 4.5" OIL & WATER DUMP LINE // ALONG SHELL ROAD & ACROSS EXISTING PIPE RACK // // Begin: EXISTING S.T.A.B. FACILITY // End: TIE-IN TO EXISTING 4.5" OIL & WATER DUMP LINE // Status: Authorization Granted - No Conditions |

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

| <u>GUP No</u> | <u>Description</u> |
|----------------------|---|
| P19910766 | AMOCO PRODUCTON COMPANY - PIPELINE // 4" PIPELINE // ON CATWALK, 3' MIN BLW MUDLINE // // Begin: TIE-IN @ EXISTING 4" P/L, SWDS #1 // End: S.L. 42 WELL # 194 // Status: Authorization Granted - No Conditions |
| P19910906 | AMOCO PRODUCTON COMPANY - GAS LIFT LINE // 2.5" GAS LIFT LINE // 3' MIN BLW SLIP, LAID ALONG SPOIL BANK // // Begin: PROPOSED GULF LAND D R/A A WELL # 52 // End: TIE-IN AT ABANDONED 2.5" PIPELINE // Status: Authorization Granted - Special Conditions |
| P19910906 | AMOCO PRODUCTON COMPANY - OIL PRODUCTION PIPELINE // 4" OIL PRODUCTION PIPELINE // 3' MIN BLW SLIP, LAID ALONG SPOIL BANK // // Begin: PROPOSED GULF LAND D R/A A WELL # 52 // End: TIE-IN AT ABANDONED 4" PIPELINE // Status: Authorization Granted - Special Conditions |
| P19910949 | AMOCO PRODUCTON COMPANY - // 2.5" PIPELINE // 3' MIN BLW ML // // Begin: WELL 53 // End: TIE IN @ EXISTING 2 LINES // Status: Authorization Granted - Special Conditions |
| P19910949 | AMOCO PRODUCTON COMPANY - // 4" PIPELINE // 3' MIN BLW ML // // Begin: WELL 53 // End: TIE IN @ EXISTING 2 LINES // Status: Authorization Granted - Special Conditions |
| P19911111 | AMOCO PRODUCTON COMPANY - // 2.5" FLOWLINE // 3' BML / BANKS / PLATFORM // // Begin: GULF LAND D R/A A WELL NO 54 // End: TIE IN AT EXISTING F/L // Status: Authorization Granted - No Conditions |
| P19911111 | AMOCO PRODUCTON COMPANY - // 4" FLOWLINE // 3' BML / BANKS / PLATFORM // // Begin: GULF LAND D R/A A WELL NO 54 // End: TIE IN AT EXISTING F/L // Status: Authorization Granted - No Conditions |
| P19920004 | AMOCO PRODUCTON COMPANY - GAS // 6" EMERGENCY GAS VENT LINE // ON PIPE RACK AND 1' BLW PARKING AREA // // Begin: LEVEE // End: TANK BATTERY #5 // Status: Authorization Granted - No Conditions |
| P19920005 | AMOCO PRODUCTON COMPANY - GAS // 4" EMERGENCY GAS VENT LINE // ABOVE GROUND ON PIPE RACK // // Begin: LEVEE // End: TANK BATTERY // Status: Authorization Granted - No Conditions |
| P19920010 | Cameron Parish Police Jury - Christmas tree bank sediment capture/wave dampening project. Secs. 14 & 23, T12S - R10W |
| P19920016 | MMP Area |
| P19920016 | SPOIL |
| P19920016 | Weir |
| P19920170 | AMOCO PRODUCTON COMPANY - GAS // 2.5" GAS LIFT LINE // 3' BLW MUDLINE // // Begin: GULF LAND A R/A C WELL # 42 // End: HEADER @ STAB UNIT // Status: Authorization Granted - No Conditions |
| P19920290 | AMOCO PRODUCTON COMPANY - // 2.5" FLOWLINE // ON LIMESTONE // // Begin: WELL #14 // End: TIE IN @ GAS LIFT LINE // Status: Authorization Granted - No Conditions |
| P19920493 | AMOCO PRODUCTON COMPANY - GAS // 2 1/2" GAS LIFT LINE // 3' MIN BLW ML // // Begin: WELL NO 248 // End: EXISTING FLOWLINE // Status: Authorization Granted - No Conditions |
| P19920493 | AMOCO PRODUCTON COMPANY - GAS // 2 1/2" GAS LIFT LINE // 3' MIN BLW ML // // Begin: // End: EXISTING FLOWLINE // Status: Authorization Granted - No Conditions |

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

| CUP No. | Description |
|----------------|---|
| P19920493 | AMOCO PRODUCTON COMPANY - OIL // 2 1/2" OIL PROD. FLOWLINE // 3' MIN BLW ML // // Begin: // End: EXISTING FLOWLINE // Status: Authorization Granted - No Conditions |
| P19920493 | AMOCO PRODUCTON COMPANY - OIL // 4" OIL PRODUCTION FLOWLINE // 3' MIN BLW ML // // Begin: WELL NO 248 // End: EXISTING FLOWLINE // Status: Authorization Granted - No Conditions |
| P19920681 | CAMERON TELEPHONE CO - FIBER OPTICS // FIBER OPTIC TOLL CABLE // 3' BLW ML ; 10' MIN BLW ML @ CANAL XING // // Begin: ALONG HIGHWAYS 27 & 82 // End: // Status: Authorization Granted - Special Conditions |
| P19920964 | Amoco Production Co. - Reentry/workover ops. of P&A Mrs. J. B. Watkins Well No. 2, West Hackberry Field, Sec. 24, T12S - R11W |
| P19920996 | Amoco Production Co. - Cleanout existing slip to float in workover rig. R/W of P&A Gulf Land D R/A A Well # 17, West Hackberry Field, Sec. 24, T12S - R11W |
| P19921087 | Amoco Production Co. - Reenter/workover Gulf Land DR/A A Well #41, by moving drill rig, discharge mud and water into slip, in West Hackberry Field, Sec. 25, T12S - R11W |
| P19921089 | Amoco Production Co. - Reenter/workover Gulf Land DR/A A Well #56 (formerly #13), by moving drill rig, discharge mud and water into slip, in West Hackberry Field, Sec. 24, T12S - R11W |
| P19921162 | AMOCO PRODUCTON COMPANY - // 4" PRODUCTION LINE // PIPE RACKS // // Begin: MRS. J.B. WATKINS # 25 // End: MANIFOLD AT HEADER // Status: Authorization Granted - No Conditions |
| P19921162 | AMOCO PRODUCTON COMPANY - GAS // 2.5" GAS LIFT LINE // PIPE RACKS // // Begin: MRS. J. B. WATKINS #25 // End: MANIFOLD AT HEADER // Status: Authorization Granted - No Conditions |
| P19921162 | AMOCO PRODUCTON COMPANY - PRODUCTION // 4" PRODUCTION LINE // ROAD PAD / PIPE RACKS // // Begin: EXISTING FLOWLINE // End: MANIFOLD AT HEADER // Status: Authorization Granted - No Conditions |
| P19921207 | Cameron Parish Police Jury - Construct six wave dampening fences using x-mas trees, with a total length of 918', SE corner of Black Lake |
| P19921230 | AMOCO PRODUCTON COMPANY - // 2" COMPRESSOR SCRUBBER DUMP LINE // PIPE RACK / ON OR SUSPENDED OVER PAD @ T. B. // // Begin: COMPRESSOR STATION // End: TANK BATTERY // Status: Authorization Granted - No Conditions |
| P19921230 | AMOCO PRODUCTON COMPANY - // 2" WELLHEAD SCRUBBER DUMP LINE // 2' DEEP IN CASING @DR DUMP/ON PIPERACKS // // Begin: SCRUBBER AT WELL PAD // End: TANK BATTERY // Status: Authorization Granted - No Conditions |
| P19921230 | AMOCO PRODUCTON COMPANY - // 2" WELLHEAD SCRUBBER DUMP LINE // WELLHEAD PLTFRM/SUSPENDED/PIPERACK/ // // Begin: SCRUBBER ON WELLHEAD PLATFORM // End: TANK BATTERY // Status: Authorization Granted - No Conditions |
| P19921230 | AMOCO PRODUCTON COMPANY - // 4" PRODUCTION LINE // 1' DEEP IN CASING @RD DUMP/GROUND/PIPERACK // // Begin: TIE-IN TO EXT 4" LINE // End: TIE-IN TO EXT 4" LINE // Status: Authorization Granted - No Conditions |

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

| CUP No. | Description |
|-----------|---|
| P19921230 | AMOCO PRODUCTON COMPANY - // 4" PRODUCTION LINE // SUSPENDED/PIPERACKS/GROUND/1'DEEP/DUMP... // // Begin: WELLHEAD 18 // End: MANIFOLD AT HEADER // Status: Authorization Granted - No Conditions |
| P19921230 | AMOCO PRODUCTON COMPANY - // 4" PRODUCTION LINE // WELLHEAD PLTRFM/UNDRSLIP/GROUND/PIPE RACK... // // Begin: STAB #5 // End: WELLHEAD PLATFORM // Status: Authorization Granted - No Conditions |
| P19921230 | AMOCO PRODUCTON COMPANY - AIR // 2" AIR INJECTION LINE // 2' DEEP IN CASING @ RD DUMP / ON PIPE RACK // // Begin: COMPRESSOR STATION // End: WELL PAD // Status: Authorization Granted - No Conditions |
| P19921230 | AMOCO PRODUCTON COMPANY - AIR // 2" AIR INJECTION LINE // 2' DEEP/PIPERACK/WELLHEAD/UNDER CANAL // // Begin: COMPRESSOR STATION // End: WELLHEAD GLDA 51 // Status: Authorization Granted - No Conditions |
| P19921230 | AMOCO PRODUCTON COMPANY - AIR // 2.5" AIR INJECTION LINE // 2' DEEP/GROUND/PIPERACKS/UNDER CANAL/WELLHEAD // // Begin: COMPRESSOR STATION // End: EXISTING SPARE FLOWLINE TO TIE-IN AT TANK BATTERY #5 // Status: Authorization Granted - No Conditions |
| P19921230 | AMOCO PRODUCTON COMPANY - GAS // 2.5" FUEL GAS LINE // SUSPENDED OVER PAD @ STAB 5 / PIPE RACKS // // Begin: METER STATION // End: COMPRESSOR STATION // Status: Authorization Granted - No Conditions |
| P19921230 | AMOCO PRODUCTON COMPANY - GAS // 2.5" GAS LIFT LINE // 1' DEEP IN CAS@RDUMP/ ONGROUND/ PIPERACK... // // Begin: WELLHEAD GLDA 56 // End: TIE-INT TO SPARE FLOWLINE FROM STAB #5 // Status: Authorization Granted - No Conditions |
| P19921230 | AMOCO PRODUCTON COMPANY - GAS // 2.5" GAS LIFT LINE // GROUND/PIPERACK/2'DEEP/UNDERCANAL&SLIP... // // Begin: STAB #5 // End: WELLHEAD GLDA 57 // Status: Authorization Granted - No Conditions |
| P19921230 | AMOCO PRODUCTON COMPANY - GAS // 2.5" GAS LIFT LINE // PIPE RACK / 1' DEEP IN CASING AT ROAD DUMP // // Begin: TIE-IN TO EXT LINE // End: WELLHEAD J.B.W 18 // Status: Authorization Granted - No Conditions |
| P19921230 | AMOCO PRODUCTON COMPANY - OIL // 2" OIL SUMP DRAIN LINE // PIPE RACK / SUSPENDED OVR PAD @ COMPRESSOR // // Begin: TANK BATTERY // End: COMPRESSOR STATION // Status: Authorization Granted - No Conditions |
| P19921230 | AMOCO PRODUCTON COMPANY - OIL/GAS // 2.5" // // // Begin: COMPRESSOR STATION // End: RISER TO SPARE FLOWLINE // Status: Authorization Granted - No Conditions |
| P19921230 | AMOCO PRODUCTON COMPANY - PRODUCTION LINE // 4" PRODUCTION LINE // SLIP/WELLHEAD/SUSPENDED@PIPERACKS/GROUND... // // Begin: WELLHEAD GLDA 56 // End: MANIFOLD AT HEADER // Status: Authorization Granted - No Conditions |
| P19921230 | AMOCO PRODUCTON COMPANY - RAINWATER // 2" RAINWATER SUMP DRAIN LINE // PIPE RACK / SUSPENDED...FACILITY AND TANK BAT // // Begin: TANK BATTERY // End: COMPRESSOR STATION // Status: Authorization Granted - No Conditions |

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

| CUP No. | Description |
|-----------|--|
| P19921230 | AMOCO PRODUCTION COMPANY - WATER // 2" PURGE WATER LINE // 2' DEEP IN CASING @RD DUMP/ON PIPERACK // // Begin: WATER PUMP NEAR TANK BATTERY // End: WELL PAD // Status: Authorization Granted - No Conditions |
| P19921230 | AMOCO PRODUCTION COMPANY - WATER // 2" PURGE WATER LINE // PIPERACK/2' DEEP/SUSPENDED/UNDER CANAL/WELLHD // // Begin: PUMP NEAR T.B. // End: WELLHEAD GLDA 51 // Status: Authorization Granted - No Conditions |
| P19921230 | AMOCO PRODUCTION COMPANY - WATER // 4" WATER STORAGE FILL LINE // ON WKWAY / ON GRND / 1' DP IN CSING @ RD DUMP // // Begin: TANK BATTERY // End: BARGE DOCK // Status: Authorization Granted - No Conditions |
| P19930047 | Amoco Production Co. - Mnt.Drdg., spoil disposal, compressor barge, shell pad, pilings, boat dock, walkway and shell pad in West hackberry Field, Sec. 24, T12S - R11W |
| P19930575 | LA DNR/ Coastal Restoration - Conduct a demonstration earthen terracing project, Sec. 26, T12S - R11W |
| P19930627 | Southern Petroleum Company - Transferred to WRT Energy Corporation. Refurbish & reuse, including laying boards on an existing shell road, existing ring levee and drill pad to drill the M. P. Ewin "A" #66 Well, Sec. 12, T12S - R10W |
| P19930781 | TRIDENT NGL - // 8" REPLACEMENT PIPELINE // 7' MIN BLW MARSH / 5' MIN BLW CANAL XING // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P19931321 | AMOCO PRODUCTION COMPANY - // 4" PRODUCTION LINE // ON GROUND // // Begin: WELL # 17 // End: MAINFOLD @ HEADER // Status: Authorization Granted - No Conditions |
| P19931321 | AMOCO PRODUCTION COMPANY - GAS // 2.5" GAS LIFT LINE // ON GROUND // // Begin: WELL # 17 // End: GAS LIFT HEADER // Status: Authorization Granted - No Conditions |
| P19940676 | WRT ENERGY CORP - GAS // 4" PIPELINE // TOP OF GROUND TO 3' BLW ML // // Begin: B. VINCENT WELL # 7 // End: PLANT FACILITY // Status: Authorization Granted - Special Conditions |
| P19940920 | AMOCO PRODUCTION COMPANY - OIL // 4" PIPELINE // ON GROUND/ON PIPERACKS/3' BML@OPEN WATER // // Begin: EXISTING PIPELINE // End: EXISTING PIPELINE // Status: Authorization Granted - Special Conditions |
| P19941076 | AMOCO PRODUCTION COMPANY - GAS // 2 1/2" GAS LIFT LINE // PLATFORM/SPOILBANKS/ 3' BML@WATER/PIPE BNTS // // Begin: WELL NO 55 // End: TIE-IN TO EXISTING LINES ON PIPE BRIDGE // Status: Authorization Granted - Special Conditions |
| P19941076 | AMOCO PRODUCTION COMPANY - PRODUCTION // 4" PRODUCTION PIPELINE // PLATFORM/SPOILBANKS/ 3' BML@WATER/PIPE BNTS // // Begin: WELL NO 55 // End: TIE-IN TO EXISTING LINES ON PIPE BRIDGE // Status: Authorization Granted - Special Conditions |
| P19951188 | AMOCO PRODUCTION COMPANY - AIR // 2" AIR INJECTION FLOWLINE // ON PIPE RACKS, PILINGS, & WELL PAD // // Begin: EXISTING AIR INJECTION LINE // End: WELLHEAD J.B WATKINS 18 // Status: Authorization Granted - No Conditions |

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

| CUP No | Description |
|-----------|---|
| P19951411 | Amoco Production Co. - Maintenance dredging (\pm 18 linear miles) for O/G access channels, canals & slips in Hackberry Field east & west of Black Lake, T12S - R10W and T12S - R11W. |
| P19960112 | PROPOSED CULVERTS AND WATER CONTROL STRUCTURE |
| P19960112 | PROPOSED REMOVAL OF OLD BOX CULVERTS |
| P19960445 | AMOCO PRODUCTON COMPANY - AIR INJECTION // 2.5" INJECTION FLOWLINE // 3' MIN BLW MUDLINE // // Begin: PROPOSED RISER/JUNCTION // End: SL 42 WELL #98 // Status: Authorization Granted - Special Conditions |
| P19960445 | AMOCO PRODUCTON COMPANY - AIR INJECTION // 2.5" INJECTION FLOWLINE // 3' MIN BLW MUDLINE UNDER LAKE // // Begin: PROPOSED 3" P/L // End: WELL #245 // Status: Authorization Granted - Special Conditions |
| P19960445 | AMOCO PRODUCTON COMPANY - AIR INJECTION // 3" INJECTION FLOWLINE // LAID ON PIPE BRIDGE / 10' BLW CHANNEL XING // // Begin: TIE-IN TO SPARE F/L @ T.B. #5 // End: PROPOSED RISER/JUNCTION // Status: Authorization Granted - Special Conditions |
| P19960445 | AMOCO PRODUCTON COMPANY - AIR INJECTION // 3" INJECTION FLOWLINE // ON PIPE BRIDGE // // Begin: PROPOSED 3" P/L // End: END OF PIPE BRIDGE // Status: Authorization Granted - Special Conditions |
| P19960947 | AMOCO PRODUCTON COMPANY - AIR INJECTION // 2.5" AIR INJECTION LINE // 3' MIN BLW MUDLINE // // Begin: RISER/JUNCTION @ PIPE BRIDGE // End: SL 42 WELL #172 // Status: Authorization Granted - Special Conditions |
| P19960947 | AMOCO PRODUCTON COMPANY - AIR INJECTION // 3" AIR INJECTION LINE // LAID ON PIPE BRIDGE / 3' BLW MUDLINE // // Begin: JUNCTION ON PIPE BRIDGE // End: TIE-IN @ EXISTING 3" LINE // Status: Authorization Granted - Special Conditions |
| P19960947 | JUNCTION ON PIPE BRIDGE |
| P19960947 | RISER/JUNCTION ON PIPE BRIDGE |
| P19961822 | Amoco Production Co. - Pilings or dolphins. Well name: SL 42 Well # 225. Sec. 19, T12S - R10W |
| P19961823 | WELL #225 + STRUCTURES |
| P19970238 | SL 42 WELL #226; DRILL BARGE & STRUCTURES |
| P19971085 | AMOCO PRODUCTON COMPANY - AIR INJECTION // 2 1/2" FLOWLINE // 3' MIN BLW MUDLINE // // Begin: RISER/JUNCTION // End: PROPOSED RISER @ SL 42 WELL #175 // Status: Authorization Granted - Special Conditions |
| P19971085 | AMOCO PRODUCTON COMPANY - AIR INJECTION // 2 1/2" FLOWLINE // LAID ON TOP OF SPOIL / 3' MIN BLW ML @ CANAL & SLIP // // Begin: RISER @ STAB 14 // End: WELL #58 // Status: Authorization Granted - Special Conditions |
| P19971102 | AMOCO PRODUCTON COMPANY - FLARE GAS // 4" FLOWLINE // 3' MIN BLW MUDLINE // // Begin: SL 42 WELL #204 RISER // End: SL 42 WELL #98 RISER // Status: Authorization Granted - Special Conditions |
| P19971102 | RISER 4" @ SL 42 WELL #204 |
| P19971102 | RISER 4" @ SL 42 WELL #98 |
| P19971105 | AMOCO PRODUCTON COMPANY - FLARE GAS // 2" FLOWLINE // 3' MIN BLW MUDLINE // // Begin: SL 42 RISER WELL #221 // End: STAB UNIT 9 RISER // Status: Authorization Granted - Special Conditions |
| P19971105 | RISER 2" @ SL 42 WELL #221 |

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

| CUP No. | Description |
|----------------|---|
| P19971105 | RISER 2" @ STAB UNIT #9 |
| P19971106 | AMOCO PRODUCTION COMPANY - FLARE GAS // 2" FLOWLINE // 3' MIN BLW MUDLINE // // Begin: SL 42 WELL #220 RISER // End: STAB UNIT 9 RISER // Status: Authorization Granted - Special Conditions |
| P19971106 | RISER 2" @ SL 42 WELL #220 |
| P19971107 | AMOCO PRODUCTION COMPANY - FLARE GAS // 2" FLOWLINE // 3' MIN BLW MUDLINE // // Begin: SL 42 WELL #222 RISER // End: STAB UNIT #10 RISER // Status: Authorization Granted - Special Conditions |
| P19971107 | RISER 2" @ SL 42 WELL #222 |
| P19971107 | RISER 2" @ STAB UNIT #10 |
| P19971607 | AMOCO PRODUCTION COMPANY - FLOWLINE // 2" // LAID ON PIPE BRIDGE & 3' MIN BLW ML @ CHANNEL & SLIP // // Begin: SL 42 WELL #225 // End: STAB UNIT #8 // Status: Authorization Granted - Special Conditions |
| P19971607 | AMOCO PRODUCTION COMPANY - FLOWLINE // 4" // LAID ON PIPE BRIDGE & 3' MIN BLW ML @ CHANNEL & SLIP // // Begin: SL 42 WELL #225 // End: CENTRAL FACILITY #2 // Status: Authorization Granted - Special Conditions |
| P19971620 | AMOCO PRODUCTION COMPANY - FLOWLINE // 2" // 3' MIN BLW MUDLINE // // Begin: RISER @ SL 42 WELL #226 // End: TIE IN @ STAB UNIT #8 // Status: Authorization Granted - Special Conditions |
| P19971620 | AMOCO PRODUCTION COMPANY - FLOWLINE // 4" // 3' MIN BLW MUDLINE / LAID ON CATWALK // // Begin: RISER @ SL 42 WELL #226 // End: CENTRAL FACILITY #2 // Status: Authorization Granted - Special Conditions |
| P19971620 | PROPOSED LINE HEATER PLATFORM NOT INSTALLED |
| P19972002 | Samuel Gary Jr & Ass - Well Name: Gulf Land D R/A B. Well #58. Dredge: ring levee new O/G only(4626 CY). Sec. 23, T12S - R11W. Impacts: 3.76 acs.. |
| P19980304 | MAINT.DREDGE BARGE BASING |
| P19980403 | CLEANOUT ROADSIDE DITCHES & MAINTENANCE ON LA 27 |
| P19980403 | CLEANOUT ROADSIDE DITCHES & MAINTENANCE ON LA 82 |
| P19980468 | Samuel Gary Jr & Ass - Well: Gulf Land A R/A. Well #1. Lat: 29 59 33.7711056 Long: -93 25 46.5638772. Impacts: 2.06 acs.. |
| P19980552 | AMOCO PRODUCTION COMPANY - AIR INJECTION // 2" FLOWLINE // ATOP SPOIL BANK & 3' MIN BLW ML @ SLIP // // Begin: RISER @ GLDA #45 PLATFORM // End: TIED-IN @ EXISTING F/L // Status: Authorization Granted - Special Conditions |
| P19980765 | AMOCO PRODUCTION COMPANY - GAS // 4" PIPELINE // 3' MIN BLW MUDLINE // ACTIVE // Begin: GLAC #255 LOC // End: TIE-IN @ PIPE RACK // Status: Authorization Granted - Special Conditions |
| P19980765 | AMOCO PRODUCTION COMPANY - SPARE LINE // 4" PIPELINE // 3' MIN BLW MUDLINE // // Begin: GLAC #255 LOC // End: TIE-IN @ PIPE RACK // Status: Authorization Granted - Special Conditions |
| P19980848 | AMOCO PRODUCTION COMPANY - FLOWLINE // 4" // 3' MIN BLW CANAL AND CHANNEL, ON TOP OF SPOIL // // Begin: GLAC #255 UNDER WELL PAD // End: TIE IN AT STAB #3 // Status: Authorization Granted - Special Conditions |
| P19980848 | AMOCO PRODUCTION COMPANY - GAS // 2" // 3' MIN BLW CANAL AND CHANNEL, ON TOP OF SPOIL // // Begin: GLAC #255 UNDER WELL PAD // End: TIE IN AT STAB #3 // Status: Authorization Granted - Special Conditions |

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

| CUP No. | Description |
|----------------|--|
| P19980899 | AMOCO PRODUCTON COMPANY - FLOWLINE // 4" // 3' MIN BLW CANAL AND OPEN WATER, TOP OF SPOIL // // Begin: WELL PAD // End: TIE IN W/ EXISTING FLOWLINES // Status: Authorization Granted - Special Conditions |
| P19980899 | AMOCO PRODUCTON COMPANY - GAS // 2" // 3' MIN BLW CANAL AND OPEN WATER, TOP OF SPOIL // // Begin: WELL PAD // End: TIE IN W/ EXISTING FLOWLINES // Status: Authorization Granted - Special Conditions |
| P19981706 | SL 42 WELL #2; STRUCTURES FOR DRILLING WELL |
| P19981707 | SL 42 WELL #1; STRUCTURES FOR DRILLING WELL |
| P19990125 | Samuel Gary Jr & Ass - Well: Gulfand D R/A B. Well #2. Sec. 23, T12S - R11W. Impacts: 2.49 acs.. |
| P19990133 | CULVERT, FILL |
| P19990140 | ADD LEVEE & METAL BULKHEAD |
| P20001402 | FILL WATER CONTR |
| P20001402 | MAHAN, CHIP - NOT A PIPELINE // DREDGING // // // Begin: // End: // Status: Application Withdrawn |
| P20001402 | REVERSIBLE PUMP |
| P20001402 | Weir |
| P20010402 | H2O CONROL STRUCTURE |
| P20010402 | REVERSIBLE PUMP |
| P20010402 | WEIR, CULVERT |
| P20010621 | DREDGE |
| P20010621 | SPOIL |
| P20011227 | DREDGE |
| P20011227 | PROPWASH |
| P20011227 | SIDETRACK, DRILL BARGE |
| P20011227 | SPOIL |
| P20011366 | DREDGE |
| P20011366 | SPOIL |
| P20011621 | DREDGE |
| P20011621 | SPOIL |
| P20011696 | DREDGING |
| P20011696 | PROPWASH |
| P20011696 | SPOIL |
| P20020433 | TEMPORARY PILINGS |
| P20020849 | LODGE |
| P20020894 | GLAC WELL # 243 |
| P20021048 | GARY WILLIAMS PRODUCTION COMPANY - NOT A PIPELINE // WALKWAY // // // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P20021048 | GARY WILLIAMS PRODUCTION COMPANY - PIPELINE // 6" // 3' - 5' MIN BLW ML / LAID ON PIPERACK // // Begin: SL 17163 PROPOSED PLATFORM // End: TANK BATTERY NO 5 // Status: Authorization Granted - Special Conditions |
| P20021048 | LINE HEATER PLATFORM W/ BOAT DOCK |
| P20021403 | DREDGE FOR WELL 244 |

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

| CUP No. | Description |
|-----------|---|
| P20021403 | PROP. GLAC WELL 244 |
| P20021537 | GEOTECHNICAL INVESTIGATION |
| P20030192 | HILCORP ENERGY COMPANY - FLOWLINE // 3" // ON DRY MARSH & 3' MIN BLW ML @ OPEN WATER // // Begin: EXISTING PLATFORM // End: GLAC WELL # 243 // Status: Authorization Granted - Special Conditions |
| P20030192 | HILCORP ENERGY COMPANY - GAS LIFT LINE // 2" // ON DRY MARSH & 3' MIN BLW ML @ OPEN WATER // // Begin: EXISTING PLATFORM // End: GLAC WELL # 243 // Status: Authorization Granted - Special Conditions |
| P20030192 | SHORELINE EROSION CONTROL : 20' OF RIP-RAP |
| P20030625 | 4 TERRACES TO CONTROL EROSION |
| P20030625 | TWO ACRE POND |
| P20040353 | PLUG & ABANDON WATKINS NO. 035 |
| P20041774 | BENEFICIAL USE FOR P20020932 - AREA 'L' |
| P20041774 | BENEFICIAL USE FOR P20020932 - ZONE 1 |
| P20041774 | MARSH MITIGATION AREA - FINAL |
| P20051041 | BANK STABILIZATION |
| P20051041 | HILCORP ENERGY COMPANY - FLOWLINE // 4" // 3' - 5' BLW WL & MARSH // PROPOSED // Begin: HACKBERRY FIELD // End: HACKBERRY FIELD // Status: Authorization Granted - Special Conditions |
| P20051041 | HILCORP ENERGY COMPANY - FLOWLINE // 6" // 3' - 5' BLW WL & MARSH // PROPOSED // Begin: HACKBERRY FIELD // End: HACKBERRY FIELD // Status: Authorization Granted - Special Conditions |
| P20060185 | BANK STABILIZATION |
| P20060185 | HILCORP ENERGY COMPANY - FLOWLINE // 4" // 5' MIN BLW WATERLINE & TOP OF MARSH // PROPOSED // Begin: HACKBERRY FIELD // End: HACKBERRY FIELD // Status: Authorization Granted - Special Conditions |
| P20060185 | HILCORP ENERGY COMPANY - FLOWLINE // 6" // 5' MIN BLW WATERLINE & TOP OF MARSH // PROPOSED // Begin: HACKBERRY FIELD // End: HACKBERRY FIELD // Status: Authorization Granted - Special Conditions |
| P20060300 | MITIGATION FOR P20041751- TERRACES/PLANTINGS |
| P20060360 | SITE CLEARANCE SL 42 #194 WELL |
| P20060565 | TERRACES |
| P20060757 | BANK STABILIZATION |
| P20060757 | HILCORP ENERGY COMPANY - FLOWLINE // 4" // LAID ON TOP OF GROUND & 3' MIN BLW ML // PROPOSED // Begin: GULF LAND NO 116 // End: EXIST. S.T.A.B. NO 17 // Status: Authorization Granted - Special Conditions |
| P20061146 | SITE CLEARANCE SL 42 NO 194 WELL |
| P20061148 | ENTERGY GULF STATES, INC. - NOT A PIPELINE // AREAWIDE - TRANSMISSION REPAIRS // // // Begin: HOLLY TAP STATION // End: CHOUPIQUE SUBSTATION // Status: Application Withdrawn |
| P20061148 | ENTERGY GULF STATES, INC. - NOT A PIPELINE // AREAWIDE - TRANSMISSION REPAIRS // // // Begin: SABINE SUBSTATION // End: CARLYSS SUBSTATION // Status: Application Withdrawn |
| P20070392 | ENTERGY NEW STRUCTURE |
| P20070392 | ENTERGY STRUCTURE REPAIR |

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

| PERMIT NO. | Description |
|------------|--|
| P20070896 | BORING LOCATION |
| P20070896 | CAMERON PARISH WATER WORKS DISTRICT NO. 2, WARD 6 - WATERLINE // 8" // 3' - 15' BLW ML // PROPOSED // Begin: HACKBERRY // End: SEMPRA LNG FACILITY // Status: Authorization Granted - Special Conditions |
| P20071762 | PLUG & ABANDON |
| P20080450 | CAVERN WELL #1 |
| P20080450 | CAVERN WELL #2 |
| P20080450 | CAVERN WELL #3 |
| P20080450 | CAVERN WELL #4 |
| P20080450 | LA STORAGE LLC - BRINE PIPELINE // 16" // 4.5' BLW ML // PROPOSED // Begin: LIBERTY GAS STORAGE FACILITY // End: PT NEAR SWD WELL #4 // Status: Authorization Granted - Special Conditions |
| P20080450 | LA STORAGE LLC - GAS PIPELINE // 36" // 5' BLW ML // PROPOSED // Begin: LIBERTY GAS STORAGE FACILITY // End: 42" INTERCONNECT // Status: Authorization Granted - Special Conditions |
| P20080450 | LIBERTY GAS STORAGE EXPANSION |
| P20080450 | SWD WELL #1 |
| P20080450 | SWD WELL #2 |
| P20080450 | SWD WELL #3 |
| P20080450 | SWD WELL #4 |
| P20080687 | LEVEE REPAIR - SECONDARY UNIT |
| P20080687 | MARSH MANAGEMENT - TERRACES; PRIMARY & SECONDARY |
| P20080687 | RYCADE CANAL HYDROLOGIC PROJECT: MARCANTEL LEVEE |
| P20090746 | TERRACES |
| P20100182 | WELL LOCATION & STRS: SL 42 #227 |
| P20100299 | TEXAS PETROLEUM INVESTMENT COMPANY - PIPELINE // 3" // 3.5' MAX BLW ML // ACTIVE // Begin: SL 42 WELL NO 227 // End: EXISTING PRODUCTION FACILITY // Status: Authorization Granted - Special Conditions |
| P20100398 | CAMERON LNG, LLC - DISCHARGE PIPES - TEMPORARY // 30" // // TEMPORARY // Begin: // End: // Status: Authorization Granted - Special Conditions |
| P20100398 | MAINTENANCE DREDGE AREA - ADDITIONAL |
| P20100398 | MAINTENANCE DREDGING |
| P20100398 | RETAINING LEVEE AREA A3 (OPTION 1) |
| P20100398 | SPOIL PLACEMENT AREA A1 (OPTION 1 & 2) |
| P20100398 | SPOIL PLACEMENT AREA A2 (OPTION 1 & 2) |
| P20100398 | SPOIL PLACEMENT AREA A3 (OPTION 1 & 2) |
| P20100398 | SPOIL PLACEMENT AREA B1 (OPTION 1 & 2) |
| P20101174 | TEXAS PETROLEUM INVESTMENT COMPANY - FLOWLINE // 4" // 4' MIN BLW ML // PROPOSED // Begin: SEPARATOR PLATFORM // End: PIPELINE RACK // Status: Authorization Granted - Special Conditions |
| P20101301 | DREDGE @ HILCORP 15 WELL #1 |
| P20101301 | HILCORP 15 WELL #1 & STRUCTURES |
| P20101301 | SPOIL PLACEMENT @ ELEV TO MARSH EST |

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

| CUP No. | Description |
|----------------|---|
| P20101301 | THREE PILE CLUSTERS (3) 40' APART |
| P20110185 | BANK STABILIZATION |
| P20110352 | GULFPORT ENERGY CORPORATION - PIPELINE // 4" // LAID ON MARSH & 3' BLW ML // PROPOSED // Begin: HILCORP FEE 15 WELL NO 1 // End: PROPOSED PLATFORM // Status: Authorization Granted - Special Conditions |
| P20110352 | PLATFORM: 12' X 24' |
| P20110352 | PLATFORM: 20' X 20' |
| P20110636 | DREDGING |
| P20110636 | SPOIL PLACEMENT |
| P20110636 | WELL LOCATION: HILCORP 14 NO 1 |
| P20111535 | DREDGING |
| P20111535 | SPOIL PLACEMENT |
| P20111535 | WELL LOCATION: HILCORP 14 NO 2 (NO NEW STRS) |
| P20111535 | WELL LOCATION: HILCORP 14 NO 3 (NO NEW STRS) |
| P20111655 | GULFPORT ENERGY CORPORATION - FLOWLINE // (2) 6" // LAID ON MARSH SURFACE // PROPOSED // Begin: EXISTING FLOWLINE // End: PROPOSED HEADER PLATFORM // Status: Authorization Granted - Special Conditions |
| P20111655 | GULFPORT ENERGY CORPORATION - FLOWLINE // (3) 6" // LAID ON MARSH SURFACE // PROPOSED // Begin: HILCORP FEE WELL NO. 1 // End: PROPOSED HEADER PLATFORM // Status: Authorization Granted - Special Conditions |
| P20111655 | GULFPORT ENERGY CORPORATION - FLOWLINE // (4) 6" // LAID ON MARSH SURFACE // PROPOSED // Begin: PROPOSED HEADER PLATFORM // End: PROPOSED TANK BATTERY // Status: Authorization Granted - Special Conditions |
| P20111655 | HEADER PLATFORM |
| P20111655 | TANK BATTERY |
| P20111660 | GULFPORT ENERGY CORPORATION - FLOWLINE // 6" // 3' MIN BLW ML // PROPOSED // Begin: EXISTING TANK BATTERY // End: EXISTING FACILITY // Status: Authorization Granted - Special Conditions |
| P20120195 | DREDGE SLIP & SPOIL PLACEMENT |
| P20120231 | DREDGING |
| P20120231 | SPOIL |
| P20120233 | DREDGING |
| P20120233 | LOCATION HILCORP 14 WELL NO 2 & 3 |
| P20120233 | SPOIL |
| P20120850 | WELL LOCATION & STRS: HILCORP FEE 15 NO 2 |
| P20120900 | POWER POLE INSTALLATION |
| P20120916 | BANK STABILIZATION |
| P20120916 | DREDGING |
| P20120916 | LOCATION HILCORP FEE 14 WELL NO 4 |
| P20120916 | SPOIL |
| P20120916 | SPOIL PLACEMENT (10' X 41') |
| P20120916 | UNAUTHORIZED FILL: 32' X 42' |

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

| CUP No. | Description |
|-----------|------------------------------------|
| P20120941 | DREDGING - SUCTION |
| P20120941 | HILCORP FEE 14 WELL NO 5 |
| P20120941 | SPOIL |
| P20120952 | DREDGE SLIP |
| P20120952 | SPOIL PLACEMENT |
| P20120952 | WELL LOCATION: HILCORP FEE 15 NO 3 |
| P20121073 | ENTERGY SUBSTATION |
| P20121073 | L428 TRANSMISSION LINE STUDY AREA |
| P20130413 | MONITORING WELL A1-MW10 |
| P20130413 | MONITORING WELL A1-MW13 |
| P20130413 | MONITORING WELL A1-MW15 |
| P20130413 | MONITORING WELL A1-MW16 |
| P20130413 | MONITORING WELL A1-MW17 |
| P20130413 | MONITORING WELL A1-MW2 |
| P20130413 | MONITORING WELL A1-MW3 |
| P20130413 | MONITORING WELL A1-MW4 |
| P20130413 | MONITORING WELL A1-MW5 |
| P20130413 | MONITORING WELL A1-MW6 |
| P20130413 | MONITORING WELL A1-MW7 |
| P20130413 | MONITORING WELL A1-MW8 |
| P20130413 | MONITORING WELL A2-MW1 |
| P20130413 | MONITORING WELL A2-MW10 |
| P20130413 | MONITORING WELL A2-MW11 |
| P20130413 | MONITORING WELL A2-MW12 |
| P20130413 | MONITORING WELL A2-MW13 |
| P20130413 | MONITORING WELL A2-MW14 |
| P20130413 | MONITORING WELL A2-MW15 |
| P20130413 | MONITORING WELL A2-MW16 |
| P20130413 | MONITORING WELL A2-MW17 |
| P20130413 | MONITORING WELL A2-MW18 |
| P20130413 | MONITORING WELL A2-MW19 |
| P20130413 | MONITORING WELL A2-MW2 |
| P20130413 | MONITORING WELL A2-MW20 |
| P20130413 | MONITORING WELL A2-MW21 |
| P20130413 | MONITORING WELL A2-MW22 |
| P20130413 | MONITORING WELL A2-MW23 |
| P20130413 | MONITORING WELL A2-MW24 |
| P20130413 | MONITORING WELL A2-MW25 |
| P20130413 | MONITORING WELL A2-MW26 |
| P20130413 | MONITORING WELL A2-MW27 |
| P20130413 | MONITORING WELL A2-MW28 |
| P20130413 | MONITORING WELL A2-MW29 |

EXHIBIT D

Coastal Use Permits for Work in the Operational Area

| <u>PUP No</u> | <u>Description</u> |
|----------------------|---------------------------|
| P20130413 | MONITORING WELL A2-MW3 |
| P20130413 | MONITORING WELL A2-MW4 |
| P20130413 | MONITORING WELL A2-MW5 |
| P20130413 | MONITORING WELL A2-MW6 |
| P20130413 | MONITORING WELL A2-MW7 |
| P20130413 | MONITORING WELL A2-MW8 |
| P20130413 | MONITORING WELL A2-MW9 |
| P20130413 | MONITORING WELL A3-MW1 |
| P20130413 | MONITORING WELL A3-MW10 |
| P20130413 | MONITORING WELL A3-MW11 |
| P20130413 | MONITORING WELL A3-MW12 |
| P20130413 | MONITORING WELL A3-MW13 |
| P20130413 | MONITORING WELL A3-MW2 |
| P20130413 | MONITORING WELL A3-MW3 |
| P20130413 | MONITORING WELL A3-MW4 |
| P20130413 | MONITORING WELL A3-MW5 |
| P20130413 | MONITORING WELL A3-MW6 |
| P20130413 | MONITORING WELL A3-MW7 |
| P20130413 | MONITORING WELL A3-MW8 |
| P20130413 | MONITORING WELL A3-MW9 |
| P20130413 | MONITORING WELL A4-MW1 |
| P20130413 | MONITORING WELL A4-MW2 |
| P20130413 | MONITORING WELL A4-MW3 |
| P20130413 | MONITORING WELL A4-MW5 |
| P20130413 | MONITORING WELL A4-MW7 |
| P20130413 | MONITORING WELL A5-MW1 |
| P20130413 | MONITORING WELL A5-MW10 |
| P20130413 | MONITORING WELL A5-MW11 |
| P20130413 | MONITORING WELL A5-MW12 |
| P20130413 | MONITORING WELL A5-MW13 |
| P20130413 | MONITORING WELL A5-MW14 |
| P20130413 | MONITORING WELL A5-MW2 |
| P20130413 | MONITORING WELL A5-MW3 |
| P20130413 | MONITORING WELL A5-MW4 |
| P20130413 | MONITORING WELL A5-MW5 |
| P20130413 | MONITORING WELL A5-MW6 |
| P20130413 | MONITORING WELL A5-MW7 |
| P20130413 | MONITORING WELL A5-MW8 |
| P20130413 | MONITORING WELL A5-MW9 |
| P20130413 | SAMPLING AREA 1 |
| P20130413 | SAMPLING AREA 2 |
| P20130413 | SAMPLING AREA 3 |

EXHIBIT D

Coastal Use Permits for Work in the Operational Area

| <u>CUF No.</u> | <u>Description</u> |
|-----------------------|---------------------------|
| P20130413 | SAMPLING AREA 4 |
| P20130413 | SAMPLING AREA 5 |
| P20130413 | SOIL BORING A1-SB10 |
| P20130413 | SOIL BORING A1-SB2 |
| P20130413 | SOIL BORING A1-SB3 |
| P20130413 | SOIL BORING A1-SB5 |
| P20130413 | SOIL BORING A1-SB6 |
| P20130413 | SOIL BORING A1-SB7 |
| P20130413 | SOIL BORING A1-SB9 |
| P20130413 | SOIL BORING A2-SB1 |
| P20130413 | SOIL BORING A2-SB10 |
| P20130413 | SOIL BORING A2-SB11 |
| P20130413 | SOIL BORING A2-SB12 |
| P20130413 | SOIL BORING A2-SB13 |
| P20130413 | SOIL BORING A2-SB14 |
| P20130413 | SOIL BORING A2-SB15 |
| P20130413 | SOIL BORING A2-SB16 |
| P20130413 | SOIL BORING A2-SB17 |
| P20130413 | SOIL BORING A2-SB18 |
| P20130413 | SOIL BORING A2-SB19 |
| P20130413 | SOIL BORING A2-SB2 |
| P20130413 | SOIL BORING A2-SB20 |
| P20130413 | SOIL BORING A2-SB21 |
| P20130413 | SOIL BORING A2-SB22 |
| P20130413 | SOIL BORING A2-SB23 |
| P20130413 | SOIL BORING A2-SB24 |
| P20130413 | SOIL BORING A2-SB25 |
| P20130413 | SOIL BORING A2-SB26 |
| P20130413 | SOIL BORING A2-SB27 |
| P20130413 | SOIL BORING A2-SB28 |
| P20130413 | SOIL BORING A2-SB29 |
| P20130413 | SOIL BORING A2-SB3 |
| P20130413 | SOIL BORING A2-SB30 |
| P20130413 | SOIL BORING A2-SB4 |
| P20130413 | SOIL BORING A2-SB5 |
| P20130413 | SOIL BORING A2-SB6 |
| P20130413 | SOIL BORING A2-SB7 |
| P20130413 | SOIL BORING A2-SB8 |
| P20130413 | SOIL BORING A2-SB9 |
| P20130413 | SOIL BORING A3-SB1 |
| P20130413 | SOIL BORING A3-SB10 |
| P20130413 | SOIL BORING A3-SB11 |

EXHIBIT D

Coastal Use Permits for Work in the Operational Area

| <u>Permit No.</u> | <u>Description</u> |
|--------------------------|----------------------------|
| P20130413 | SOIL BORING A3-SB12 |
| P20130413 | SOIL BORING A3-SB13 |
| P20130413 | SOIL BORING A3-SB14 |
| P20130413 | SOIL BORING A3-SB2 |
| P20130413 | SOIL BORING A3-SB3 |
| P20130413 | SOIL BORING A3-SB4 |
| P20130413 | SOIL BORING A3-SB5 |
| P20130413 | SOIL BORING A3-SB6 |
| P20130413 | SOIL BORING A3-SB7 |
| P20130413 | SOIL BORING A3-SB8 |
| P20130413 | SOIL BORING A3-SB9 |
| P20130413 | SOIL BORING A4-SB1 |
| P20130413 | SOIL BORING A4-SB11 |
| P20130413 | SOIL BORING A4-SB2 |
| P20130413 | SOIL BORING A4-SB3 |
| P20130413 | SOIL BORING A4-SB4 |
| P20130413 | SOIL BORING A4-SB5 |
| P20130413 | SOIL BORING A4-SB6 |
| P20130413 | SOIL BORING A4-SB7 |
| P20130413 | SOIL BORING A4-SB8 |
| P20130413 | SOIL BORING A5-SB1 |
| P20130413 | SOIL BORING A5-SB10 |
| P20130413 | SOIL BORING A5-SB11 |
| P20130413 | SOIL BORING A5-SB12 |
| P20130413 | SOIL BORING A5-SB13 |
| P20130413 | SOIL BORING A5-SB14 |
| P20130413 | SOIL BORING A5-SB15 |
| P20130413 | SOIL BORING A5-SB16 |
| P20130413 | SOIL BORING A5-SB2 |
| P20130413 | SOIL BORING A5-SB3 |
| P20130413 | SOIL BORING A5-SB4 |
| P20130413 | SOIL BORING A5-SB5 |
| P20130413 | SOIL BORING A5-SB6 |
| P20130413 | SOIL BORING A5-SB7 |
| P20130413 | SOIL BORING A5-SB8 |
| P20130413 | SOIL BORING A5-SB9 |
| P20130413 | STRATIGRAPHIC BORING A1-DB |
| P20130413 | STRATIGRAPHIC BORING A2-DB |
| P20130413 | STRATIGRAPHIC BORING A3-DB |
| P20130413 | STRATIGRAPHIC BORING A4-DB |
| P20130413 | STRATIGRAPHIC BORING A5-DB |
| P20130607 | SOIL SAMPLE - SITE 1 |

EXHIBIT D

Coastal Use Permits for Work in the Operational Area

| CUP No. | Description |
|----------------|------------------------------------|
| P20130607 | SOIL SAMPLE - SITE 2 |
| P20130607 | SOIL SAMPLE - SITE 3 |
| P20130760 | SAMPLING AREAS |
| P20130760 | SOIL BORING A1-MW1 |
| P20130760 | SOIL BORING A1-MW11 |
| P20130760 | SOIL BORING A1-MW12 |
| P20130760 | SOIL BORING A1-MW14 |
| P20130760 | SOIL BORING A1-MW18 |
| P20130760 | SOIL BORING A1-MW9 |
| P20130760 | SOIL BORING A1-SB1 |
| P20130760 | SOIL BORING A1-SB4 |
| P20130760 | SOIL BORING A1-SB8 |
| P20130760 | SOIL BORING A4-MW4 |
| P20130760 | SOIL BORING A4-MW6 |
| P20130760 | SOIL BORING A4-SB1 |
| P20130760 | SOIL BORING LOCATION A4-SB9 |
| P20131302 | WELL LOCATION: HILCORP FEE 15 NO 4 |
| P20131684 | PLATFORM: 4'X4' |
| P20140527 | DREDGE & SPOIL PLACEMENT |
| P20140527 | WELL LOCATION: NO 5 |
| P20140534 | DREDGE & SPOIL |
| P20140534 | WELL LOCATION & STRS: NO 6 |

EXHIBIT E

Map of Oil & Gas Wells within the Operational Area

Orange triangles indicate the surface locations of Oil & Gas Wells. *Source: LDNR*

2015 Aerial



Hackberry

EXHIBIT F

**Oil & Gas Wells Operated by Defendants and their Predecessors
within the Operational Area (by LDNR Well Serial No.)**

AMOCO PRODUCTION COMPANY

| | | |
|-------|-------|-------|
| 18681 | 39340 | 57733 |
| 24045 | 40054 | 58020 |
| 24511 | 40312 | 58627 |
| 24563 | 40566 | 59202 |
| 25226 | 41788 | 59203 |
| 25641 | 42112 | 59209 |
| 25717 | 42440 | 59210 |
| 25937 | 43397 | 59501 |
| 26115 | 44900 | 59587 |
| 26266 | 45856 | 59685 |
| 26359 | 46322 | 59790 |
| 27029 | 46579 | 59953 |
| 27384 | 46733 | 60112 |
| 27633 | 46972 | 60153 |
| 28006 | 47479 | 60200 |
| 28126 | 47652 | 60357 |
| 28354 | 47847 | 60531 |
| 28574 | 47848 | 60674 |
| 28673 | 47955 | 60684 |
| 28674 | 48567 | 60798 |
| 28717 | 48702 | 60943 |
| 29094 | 50203 | 60984 |
| 29148 | 51168 | 60985 |
| 29274 | 51756 | 61145 |
| 29684 | 51833 | 61194 |
| 29982 | 52744 | 61313 |
| 31065 | 53343 | 61454 |
| 32621 | 54383 | 61653 |
| 32834 | 55398 | 61815 |
| 33491 | 55791 | 61821 |
| 33935 | 55903 | 62090 |
| 34597 | 56469 | 62139 |
| 34904 | 56919 | 62892 |
| 38005 | 57252 | 63315 |
| 38600 | 57426 | 63452 |
| 38949 | 57706 | 63579 |

Hackberry

EXHIBIT F

**Oil & Gas Wells Operated by Defendants and their Predecessors
within the Operational Area (by LDNR Well Serial No.)**

| | | |
|-------|-------|--------|
| 63750 | 92126 | 99071 |
| 64226 | 92159 | 108412 |
| 64685 | 92206 | 108483 |
| 65196 | 92235 | 109012 |
| 65558 | 92493 | 111529 |
| 66068 | 92523 | 112538 |
| 66272 | 92704 | 112768 |
| 66563 | 92769 | 113168 |
| 67643 | 92856 | 113591 |
| 69201 | 93115 | 113669 |
| 72311 | 93225 | 113689 |
| 73646 | 93280 | 114422 |
| 82619 | 93444 | 114591 |
| 83452 | 94277 | 115294 |
| 83453 | 94592 | 116098 |
| 83938 | 95239 | 116314 |
| 84091 | 95403 | 116478 |
| 84629 | 95888 | 116934 |
| 84911 | 96029 | 117194 |
| 85605 | 96070 | 117371 |
| 85688 | 96431 | 118255 |
| 86988 | 96840 | 118429 |
| 88462 | 96865 | 119080 |
| 88615 | 97129 | 119952 |
| 89092 | 97211 | 120728 |
| 89095 | 97237 | 121550 |
| 89161 | 97238 | 121711 |
| 89410 | 97360 | 123606 |
| 90119 | 97370 | 123976 |
| 90120 | 97578 | 124496 |
| 90344 | 97869 | 124530 |
| 90660 | 98039 | 124665 |
| 91064 | 98040 | 124684 |
| 91167 | 98080 | 124924 |
| 91202 | 98329 | 125138 |
| 91255 | 98389 | 125298 |
| 91452 | 98622 | 125299 |
| 91453 | 98844 | 125634 |

Hackberry

EXHIBIT F

**Oil & Gas Wells Operated by Defendants and their Predecessors
within the Operational Area (by LDNR Well Serial No.)**

| | | |
|--------|--------|--------|
| 126159 | 142534 | 172742 |
| 126498 | 142834 | 173268 |
| 126712 | 142856 | 173594 |
| 127058 | 142914 | 174468 |
| 127602 | 142964 | 175290 |
| 128155 | 143372 | 177772 |
| 128327 | 143886 | 178320 |
| 128622 | 143969 | 178483 |
| 128808 | 144231 | 178645 |
| 129447 | 145226 | 183533 |
| 129448 | 148403 | 183534 |
| 129916 | 150134 | 185811 |
| 130261 | 150516 | 186293 |
| 130422 | 150517 | 186294 |
| 131712 | 152337 | 186502 |
| 131821 | 153378 | 186759 |
| 131887 | 153379 | 186760 |
| 132291 | 153860 | 186771 |
| 132480 | 154033 | 187289 |
| 133057 | 154167 | 187566 |
| 133091 | 154592 | 187567 |
| 133092 | 158315 | 187739 |
| 133886 | 161709 | 187740 |
| 134261 | 162753 | 188164 |
| 134396 | 162955 | 188165 |
| 134711 | 163628 | 188166 |
| 134786 | 164401 | 189610 |
| 135141 | 164402 | 190572 |
| 135845 | 165098 | 191110 |
| 136113 | 166574 | 191111 |
| 136545 | 167099 | 191112 |
| 136570 | 167671 | 191302 |
| 136645 | 167914 | 192500 |
| 138965 | 168405 | 192895 |
| 139286 | 168406 | 192896 |
| 142098 | 169201 | 192897 |
| 142375 | 169738 | 192898 |
| 142493 | 169850 | 194525 |

Hackberry

EXHIBIT F

**Oil & Gas Wells Operated by Defendants and their Predecessors
within the Operational Area (by LDNR Well Serial No.)**

| | | |
|--------|--------|--------|
| 195488 | 202042 | 205577 |
| 195517 | 202778 | 205578 |
| 195924 | 202781 | 205704 |
| 196191 | 202851 | 205715 |
| 197220 | 203007 | 205880 |
| 198098 | 203024 | 205881 |
| 198193 | 203369 | 205882 |
| 198438 | 203530 | 206002 |
| 198858 | 203692 | 206003 |
| 198859 | 203782 | 206478 |
| 199342 | 203999 | 206669 |
| 199343 | 204139 | 206805 |
| 199344 | 204140 | 207200 |
| 199598 | 204232 | 207286 |
| 199923 | 204350 | 208085 |
| 199957 | 204488 | 208086 |
| 200015 | 204626 | 208087 |
| 200016 | 204819 | 212565 |
| 200017 | 204820 | 213874 |
| 200314 | 204872 | 213875 |
| 200955 | 205174 | 217425 |
| 201239 | 205245 | 218111 |
| 201896 | 205413 | 221245 |
| 201923 | 205463 | 221710 |
| 202041 | 205576 | |

APACHE CORPORATION

92770

BP AMERICA PRODUCTION COMPANY

125636

CHEVRON OIL COMPANY

91028

CHEVRON U.S.A. INC.

| | | |
|-------|-------|-------|
| 86170 | 87032 | 87118 |
|-------|-------|-------|

Hackberry

EXHIBIT F

**Oil & Gas Wells Operated by Defendants and their Predecessors
within the Operational Area (by LDNR Well Serial No.)**

| | | |
|-------|-------|--------|
| 87585 | 90100 | 94863 |
| 87634 | 91028 | 95710 |
| 88335 | 91613 | 137665 |
| 88397 | 92349 | 147993 |
| 89276 | 92754 | 180771 |
| 89378 | 93995 | 212754 |

DARSEY OPERATING CORPORATION

183066

ENERVEST OPERATING, L.L.C.

28850 89097

FREEPORT SULPHUR CO.

28274 30191

GULF OIL CORP.

| | | |
|-------|-------|--------|
| 29149 | 88397 | 93995 |
| 86170 | 89276 | 94863 |
| 87032 | 89378 | 95710 |
| 87118 | 90100 | 137665 |
| 87585 | 91613 | 147993 |
| 87634 | 92349 | 180771 |
| 88335 | 92754 | |

GULF REFG CO

29149 88922

GULFPORT ENERGY CORPORATION

| | | |
|-------|--------|--------|
| 86170 | 94863 | 243534 |
| 87032 | 95710 | 244693 |
| 87585 | 147993 | 245542 |
| 87634 | 180771 | 245640 |
| 88335 | 183066 | 245932 |
| 88397 | 187955 | 247014 |
| 89276 | 212754 | 247099 |
| 89378 | 242651 | |

Hackberry

EXHIBIT F

**Oil & Gas Wells Operated by Defendants and their Predecessors
within the Operational Area (by LDNR Well Serial No.)**

HILCORP ENERGY COMPANY

| | | |
|-------|--------|--------|
| 25717 | 91255 | 192895 |
| 25937 | 91453 | 192897 |
| 29148 | 92856 | 192898 |
| 31065 | 118255 | 194525 |
| 32834 | 120728 | 198098 |
| 39340 | 125299 | 199343 |
| 46322 | 125634 | 199344 |
| 46733 | 127058 | 199598 |
| 47479 | 130261 | 199923 |
| 47652 | 131821 | 200016 |
| 47847 | 133091 | 200314 |
| 47955 | 136570 | 200955 |
| 48702 | 142375 | 201896 |
| 52744 | 142493 | 202041 |
| 55903 | 144231 | 202042 |
| 58627 | 158315 | 203007 |
| 59501 | 164401 | 203024 |
| 59587 | 164402 | 203369 |
| 59685 | 167914 | 203692 |
| 59790 | 173594 | 203782 |
| 59953 | 174468 | 204139 |
| 60153 | 175290 | 204140 |
| 60357 | 178320 | 204232 |
| 60531 | 178483 | 204626 |
| 60674 | 185811 | 204820 |
| 60684 | 186293 | 204872 |
| 60798 | 186759 | 205245 |
| 60984 | 187566 | 205463 |
| 60985 | 187567 | 205577 |
| 61145 | 187739 | 205578 |
| 61313 | 188166 | 205704 |
| 62139 | 189610 | 205715 |
| 65558 | 190572 | 206669 |
| 66563 | 191302 | 207286 |
| 69201 | 192500 | 208085 |

Hackberry

EXHIBIT F

**Oil & Gas Wells Operated by Defendants and their Predecessors
within the Operational Area (by LDNR Well Serial No.)**

| | | |
|--------|--------|--------|
| 208086 | 217425 | 221710 |
| 212565 | 218111 | 222050 |
| 213874 | 221245 | 227397 |

PAN AMERICAN PETROLEUM CORP.

| | | |
|-------|-------|-------|
| 27633 | 29274 | 85967 |
| 28239 | 62893 | |

PAN AMERICAN PRODUCTION CO.

| | | |
|-------|-------|--|
| 63960 | 85967 | |
|-------|-------|--|

R-5, INC

| | | |
|-------|--|--|
| 96653 | | |
|-------|--|--|

RESOURCE SECURITIES CORP.

| | | |
|--------|--|--|
| 183066 | | |
|--------|--|--|

SAMUEL GARY JR. & ASSOC., INC.

| | | |
|--------|--------|--------|
| 191302 | 222050 | 222408 |
|--------|--------|--------|

SHELL OFFSHORE INC.

| | | |
|-------|--|--|
| 28716 | | |
|-------|--|--|

SHELL OIL COMPANY

| | | |
|-------|-------|--------|
| 28716 | 52744 | 60674 |
| 45040 | 55903 | 60684 |
| 46322 | 56569 | 60798 |
| 46733 | 59587 | 60984 |
| 47479 | 59684 | 60985 |
| 47652 | 59685 | 61098 |
| 47847 | 59953 | 125634 |
| 48702 | 59954 | 127058 |
| 49943 | 60153 | 158315 |
| 50619 | 60154 | |
| 51196 | 60200 | |

Hackberry

EXHIBIT F

**Oil & Gas Wells Operated by Defendants and their Predecessors
within the Operational Area (by LDNR Well Serial No.)**

SHELL WESTERN E&P INC.

28716

SOUTHERN PETROLEUM COMPANY

| | | |
|-------|-------|--------|
| 86170 | 88397 | 147993 |
| 87032 | 89276 | 180771 |
| 87585 | 89378 | 212754 |
| 87634 | 94863 | 215860 |
| 88335 | 95710 | |

STANOLIND OIL & GAS CO.

27828

STAR ENERGY, INC.

| | |
|-------|--------|
| 31669 | 205543 |
|-------|--------|

SUN EXPLORATION-PRODUCTION CO.

| | |
|-------|-------|
| 31669 | 32569 |
|-------|-------|

SUN TEXAS COMPANY

| | |
|-------|-------|
| 31669 | 32569 |
|-------|-------|

TAYLOR ENERGY CO.

| | | |
|-------|-------|--------|
| 45040 | 52744 | 60200 |
| 46322 | 55903 | 60684 |
| 46733 | 56569 | 60798 |
| 47479 | 59587 | 60984 |
| 47652 | 59684 | 61098 |
| 47847 | 59685 | 104423 |
| 48702 | 59953 | 125634 |
| 49943 | 59954 | 127058 |
| 50619 | 60153 | 158315 |
| 51196 | 60154 | |

TEXACO E & P INC.

| | |
|-------|--------|
| 89097 | 125636 |
|-------|--------|

Hackberry

EXHIBIT F

**Oil & Gas Wells Operated by Defendants and their Predecessors
within the Operational Area (by LDNR Well Serial No.)**

TEXACO, INC.

| | | |
|-------|-------|--------|
| 29296 | 92236 | 125636 |
| 89097 | 92770 | |

TEXAS PACIFIC OIL CO.

| | | |
|-------|-------|--------|
| 13558 | 32418 | 121415 |
| 26184 | 32569 | |
| 31669 | 96653 | |

TEXAS PETROLEUM INVESTMENT COMPANY

| | | |
|-------|--------|--------|
| 25717 | 60798 | 173594 |
| 25937 | 60984 | 174468 |
| 29148 | 60985 | 175290 |
| 31065 | 61145 | 178320 |
| 32569 | 61313 | 178483 |
| 32834 | 62139 | 185811 |
| 39340 | 65558 | 186293 |
| 46322 | 66563 | 186759 |
| 46733 | 69201 | 187567 |
| 47479 | 91255 | 187739 |
| 47652 | 91453 | 188166 |
| 47847 | 92856 | 189610 |
| 47955 | 118255 | 191302 |
| 48702 | 120728 | 192500 |
| 52744 | 125299 | 192895 |
| 55903 | 125634 | 192897 |
| 58627 | 127058 | 192898 |
| 59501 | 130261 | 194525 |
| 59587 | 131821 | 198098 |
| 59685 | 133091 | 199343 |
| 59790 | 136570 | 199598 |
| 59953 | 142375 | 199923 |
| 60153 | 142493 | 200016 |
| 60357 | 144231 | 200314 |
| 60531 | 158315 | 200955 |
| 60674 | 164401 | 201896 |
| 60684 | 164402 | 202042 |

EXHIBIT F

Hackberry

**Oil & Gas Wells Operated by Defendants and their Predecessors
within the Operational Area (by LDNR Well Serial No.)**

| | | |
|--------|--------|--------|
| 203007 | 204872 | 208086 |
| 203024 | 205245 | 212565 |
| 203369 | 205463 | 213874 |
| 203692 | 205577 | 217425 |
| 203782 | 205578 | 218111 |
| 204139 | 205704 | 221245 |
| 204140 | 205715 | 221710 |
| 204232 | 206669 | 222050 |
| 204626 | 207286 | 227397 |
| 204820 | 208085 | 241105 |

THE CALIFORNIA COMPANY

| | | |
|--------|--------|--------|
| 35814 | 104655 | 109012 |
| 91028 | 108412 | |
| 104423 | 108483 | |

THE SUPERIOR OIL COMPANY

59684

THE TEXAS COMPANY

| | | |
|-------|-------|--------|
| 28850 | 89097 | 92770 |
| 29296 | 92236 | 125636 |

THE UNION SULPHUR COMPANY

| | | |
|-------|-------|--|
| 33354 | 91028 | |
| 33355 | 96653 | |

TRANSCONTINENTAL OIL CORP.

| | | |
|--------|--------|--|
| 183065 | 183066 | |
|--------|--------|--|

UNION OIL & GAS CORP OF LA

| | | |
|-------|-------|--|
| 32168 | 96653 | |
|-------|-------|--|

VASTAR RESOURCES INC.

125636

VERNON E. FAULCONER, INC.

| | | |
|-------|-------|--------|
| 31669 | 32569 | 189892 |
|-------|-------|--------|

EXHIBIT F

Oil & Gas Wells Operated by Defendants and their Predecessors
within the Operational Area (by LDNR Well Serial No.)

WRT ENERGY CORPORATION86170

| | | |
|-------|--------|--------|
| 87032 | 89276 | 180771 |
| 87585 | 89378 | 183066 |
| 87634 | 94863 | 187955 |
| 88335 | 95710 | 212754 |
| 88397 | 147993 | |

YOUNT-LEE OIL COMPANY

15026

LOUISIANA CIVIL CASE REPORTING
Civil Case Cover Sheet - LA. R.S. 13:4688 and
Part G, §13, Louisiana Supreme Court General Administrative Rules

This civil case cover sheet shall be completed by counsel for the petitioner, counsel's authorized representative, or by the self-represented litigant (if not represented by counsel) and submitted with the original petition filed with the court. The information should be the best available at the time of filing. This information does not constitute a discovery request, response or supplementation, and is not admissible at trial.

Suit Caption:

The Parish of Cameron vs. Auster Oil and Gas, Inc.

Court: 38th JDC Docket Number: _____

Parish of Filing: Cameron Filing Date: 30-13-18

Name of Lead Petitioner's Attorney: John H. Carmouche

Name of Self-Represented Litigant: _____

Number of named petitioners: 2 Number of named defendants: 26

RECEIVED & FILED
2016 FEB 4 11 PM 4 20
CLERK OF COURT
CAMERON PARISH, LA.

Type of Lawsuit: Please check the categories which most appropriately apply to this suit (no more than 3 categories should be checked):

- | | |
|---|--|
| <input type="checkbox"/> Auto: Personal Injury | <input type="checkbox"/> Auto: Property Damage |
| <input type="checkbox"/> Auto: Wrongful Death | <input type="checkbox"/> Auto: Uninsured Motorist |
| <input type="checkbox"/> Asbestos: Property Damage | <input type="checkbox"/> Asbestos: Personal Injury/Death |
| <input type="checkbox"/> Product Liability | <input type="checkbox"/> Premise Liability |
| <input type="checkbox"/> Intentional Bodily Injury | <input type="checkbox"/> Intentional Property Damage |
| <input type="checkbox"/> Intentional Wrongful Death | <input type="checkbox"/> Unfair Business Practice |
| <input type="checkbox"/> Business Tort | <input type="checkbox"/> Fraud |
| <input type="checkbox"/> Defamation | <input type="checkbox"/> Professional Negligence |
| <input type="checkbox"/> Environmental Tort | <input type="checkbox"/> Medical Malpractice |
| <input type="checkbox"/> Intellectual Property | <input type="checkbox"/> Toxic Tort |
| <input type="checkbox"/> Legal Malpractice | <input type="checkbox"/> Other Tort (describe below) |
| <input type="checkbox"/> Other Professional Malpractice | <input type="checkbox"/> Redhibition |
| <input type="checkbox"/> Maritime | <input type="checkbox"/> Class action (nature of case) |
| <input type="checkbox"/> Wrongful Death | <input checked="" type="checkbox"/> Enforcement of State Coastal Statutes and State Regulations and Local Coastal Regulations and/or Ordinances. |
| <input type="checkbox"/> General Negligence | |

Please briefly describe the nature of the litigation in one sentence of additional detail:

ENFORCEMENT OF STATE COASTAL STATUTES AND STATE REGULATIONS AND LOCAL COASTAL REGULATIONS AND/OR ORDINANCES

Following the completion of this form by counsel, counsel's representative, or by the self-represented litigant, this document will be submitted to the Office of the Judicial Administrator, Supreme Court of Louisiana, by the Clerk of Court.

Name, address and contact information of person completing form:

Name John H. Carmouche Signature John Carmouche

Address 17405 Perkins Road, Baton Rouge, LA 70810

Phone number: 225-400-9991 E-mail address: jcarmouche@tcmlawfirm.net

THIRTY EIGHTH JUDICIAL DISTRICT COURT

PARISH OF CAMERON

STATE OF LOUISIANA

NO. 10-19582

THE PARISH OF CAMERON

VS

AUSTER OIL & GAS, INC., ET AL.

RECEIVED & FILED
2016 MAR 14 PM 4 03
CLERK OF COURT
CAMERON PARISH, LA.

DATE FILED: _____ DEPUTY CLERK: _____

PETITION FOR INTERVENTION

NOW INTO COURT, through undersigned counsel, comes THE STATE OF LOUISIANA, *EX REL.* JEFF LANDRY, ATTORNEY GENERAL, who respectfully intervenes in this action to protect and enforce the rights of the citizens of the State of Louisiana to a sustainable coastal zone:

1.

The Parish of Cameron (hereinafter "the Parish") has alleged violations of the Louisiana Coastal Resources Management Act of 1978, as amended (La. R.S. 214.21, *et seq.*, hereinafter, "the LCR") in Cameron Parish as a result of activities by the defendants. The Parish has filed this action to seek restoration of property and damages.

2.

Counsel for the Parish filed the original Petition "on its own behalf and in the name of the State of Louisiana" notwithstanding the fact that there is no contract between counsel and any State agency or State official authorized to represent the State of Louisiana. This purported co-representation was done under the Parish's interpretation of La. R.S. 49:214.36, which it believed authorized such a filing.

3.

On December 1, 2014, following removal of a nearly identical suit from Plaquemines Parish to federal court, Judge Jay C. Zainey agreed with Plaquemines Parish's interpretation that

the State of Louisiana was a real party in interest and that the Parish was authorized to sue in matters such as this under La. R.S. 49:214.36(D) *on behalf of* the State of Louisiana.¹

4.

The Attorney General of the State of Louisiana files this Petition for Intervention as authorized by La. R.S. 49:214.36(D) and in accordance with his authority under Art. IV, Section. 8, of the Louisiana Constitution to intervene in any lawsuit and supersede the attorneys in representing the interests of the State of Louisiana, more specifically, “as necessary for the assertion or protection of any right or interest of the state, the attorney general **shall have the authority** (1) to institute, prosecute, or intervene in any civil action or proceeding.

5.

The Attorney General, as the Chief Legal Officer of the State, has an overriding obligation to protect the interests of the State as a whole. This matter raises issues that have policy and legal implications that are far reaching and necessitate representation by the State’s Chief Legal Officer.

6.

By filing this Petition, the State of Louisiana is not adopting the Parish’s reasoning, nor Judge Zainey’s dicta in the Plaquemines Parish suit regarding co-representation. However, to ensure that no State claims are encumbered absent the presence of the State’s Chief Legal Officer, the Attorney General hereby seeks intervention.

7.

In addition to protecting the litigious rights provided by La. R.S.49:214.36(D), the State intervenes to enforce the contents of the LCR and to ensure that any and all unpermitted and unmitigated damage to the coastal zone is remediated and restored in accordance with the Constitution of the State of Louisiana and applicable laws and regulations administered by the Louisiana Department of Natural Resources, the Coastal Protection and Restoration Authority, the Attorney General, and any other agencies and political subdivisions of the State.

8.

In the alternative, the State intervenes under the authority of the Public Trust Doctrine, Louisiana Constitution Article IX, Section 1, which provides, in pertinent part,

¹ Judge Zainey’s adoption of the Parish’s reasoning on the purported representation of the State of Louisiana was dicta as the analysis followed his proclamation that “[t]he Court’s ruling on the egregious misjoinder issue renders moot the question whether the claims on behalf of the State destroy diversity jurisdiction. For completeness, the Court nonetheless will address this potential impediment to diversity jurisdiction.” *Plaquemines v. Total Petrochemical & Refining USA, INC. et al.*, 64 F.Supp.3d. 872, 887 (E.D.La. 2014).

The natural resources of the state, including the air and water, and the healthful, scenic, historic, and esthetic quality of the environment shall be protected, conserved, and replenished insofar as possible and consistent with the health, safety, and welfare of the people. The legislature shall enact laws to implement this policy.

9.

Further, the Attorney General intervenes pursuant to Article 1091 of the Louisiana Code of Civil Procedure in that the Attorney General, as the State's chief legal officer, has the authority and responsibility to bring a *parens patriae* action to protect and preserve the State's natural resources and the environment.

10.

An intervention is defined by La. C.C.P. Art. 1031 as an incidental demand and, because no answer has been filed in this case, La. C.C.P. Art. 1033 provides that the State may intervene without leave of court.

11.

Pursuant to the aforementioned authority, the State of Louisiana, *ex rel.* Attorney General Jeff Landry, asserts its jurisdiction over all claims originally asserted by the Parish of Cameron and hereby supersedes said claims as though made by the State through the Attorney General in the first instance.

12.

The State's claims track closely to those claims asserted by the Parish under La. R.S. 49:214.36 for dredging activities contributing to the degradation of property in the coastal zone. However, the State makes no claims related to waste pits, the release of contaminants, pollutants, waste leachate, and toxic substances as put forth by the Parish.

13.

The State's claims are limited to the Defendants' oil and gas activities that resulted in the dredging of numerous canals in Cameron Parish as originally detailed in Paragraphs 25-33 of the Parish's Petition.

14.

In sum, the State of Louisiana, through the Attorney General, seeks to intervene in this suit to protect the State's independent litigious rights under La. R.S. 49:214.36, which may be interpreted as being encumbered by the Parish's current posture in this case and by previous rulings of the United States District Court for the Eastern District of Louisiana. For that reason,

the State, through the Attorney General, herein and hereby asserts as its own the Parish's claims in this matter under La. R.S. 49:214.36.

15.

The State of Louisiana asserts the right to recover all civil penalties, damages, payments of restorations costs, actual restoration of the disturbed areas, and other reasonable and proper sanctions for uses conducted within the coastal zone without a coastal use permit whether a coastal use permit is required or which are not in accordance with the terms and conditions of a coastal use permit.

16.

The State of Louisiana further asserts the right to recover costs and attorney fees from any party found to be responsible.

17.

The State of Louisiana also reserves the right to seek injunctive relief, specific performance, and any other applicable remedies or equitable or relief permitted by law.

WHEREFORE, THE STATE OF LOUISIANA, *EX REL.* JEFF LANDRY, ATTORNEY GENERAL, prays:

- (1) that judgment be rendered in favor of Intervenor and against any party found to be responsible for damage from activities conducted within the coastal zone without a coastal use permit whether a coastal use permit is required or which are not in accordance with the terms and conditions of a coastal use permit in accordance with La. R.S. 49:214.21, *et seq.*;
- (2) that, alternatively, judgment be rendered in favor of Intervenor on behalf of the State in its capacity as public trustee or as *parens patriae*, and against any party found to be responsible for damage from activities conducted within the coastal zone without a coastal use permit whether a coastal use permit is required or which are not in accordance with the terms and conditions of a coastal use permit;
- (3) that judgment be rendered in favor of the Attorney General, the Chief Legal Office of the State, to supersede the Parish's attorneys.

- (4) that judgment be rendered in favor of Intervenor and against any party found to be responsible for damage from activities conducted within the coastal zone without a coastal use permit whether a coastal use permit is required or which are not in accordance with the terms and conditions of a coastal use permit, for damages, reasonable costs and attorney fees incurred by or on behalf of the State in responding to such activities and enforcing the State's rights;
- (5) that Defendants be ordered to restore the Cameron Parish Coastal Zone to its original condition or make payments for such restoration costs.;
- (6) such other and further relief available, subject to any limitations set forth in the petition.
- (7) The State of Louisiana requests trial by jury.

Intervenor further prays for all costs of these proceedings, for all necessary orders and decrees as may be required or proper in the premises and for full, general, and equitable relief.

Respectfully submitted:

JEFF LANDRY
ATTORNEY GENERAL

By: 

Steven B. "Beaux" Jones (Bar # 33915)
Ryan M. Seidemann (Bar #28991)
Elizabeth B. Murrill (Bar #20685)
Wilbur L. Stiles, III (Bar #27654)
Assistant Attorneys General
Louisiana Department of Justice
1185 North 3rd Street
Baton Rouge, Louisiana 70802
Telephone No.: (225) 326-6085
Facsimile: (225) 326-6099
Attorneys for the State of Louisiana

SHERIFF: PLEASE WITHHOLD SERVICE

THIRTY EIGHTH JUDICIAL DISTRICT COURT

PARISH OF CAMERON

STATE OF LOUISIANA

NO. 10-19582

THE PARISH OF CAMERON

VS

AUSTER OIL & GAS, INC., ET AL.

RECEIVED & FILED
2016 MAR 14 PM 4 05
CLERK OF COURT
CAMERON PARISH, LA.

FILED

DEPUTY CLERK

ORDER

Considering the above and foregoing Petition for Intervention filed by THE STATE OF LOUISIANA, EX REL. JEFF LANDRY, ATTORNEY GENERAL;

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that the State of Louisiana's Petition for Intervention is hereby granted for the Attorney General to supersede the Plaintiff's claims in this matter on behalf of the State of Louisiana in this case.

Cameron, Louisiana, this 17th day of March, 2016.

Penelope Richard

HONORABLE PENELOPE RICHARD
JUDGE, 38th JUDICIAL DISTRICT COURT

THIRTY EIGHTH JUDICIAL DISTRICT COURT

PARISH OF CAMERON

STATE OF LOUISIANA

NO. 10-19582

THE PARISH OF CAMERON

VS

AUSTER OIL & GAS, INC., ET AL.

RECEIVED & FILED
2016 MAR 14 PM 4 05
CLERK OF COURT
CAMERON PARISH, LA.

FILED:

DEPUTY CLERK

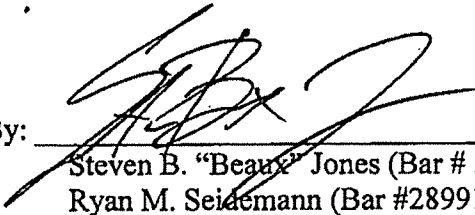
REQUEST FOR NOTICE

THE STATE OF LOUISIANA, *ex rel.* JEFF LANDRY., ATTORNEY GENERAL, respectfully requests written notice of the trial date, hearings (whether on the merits or otherwise), orders, judgments, and interlocutory decrees, and any and all other matters as provided in the Louisiana Code of Civil Procedure articles 1572, 1913, and 1914.

Respectfully submitted:

JEFF LANDRY
ATTORNEY GENERAL

By:


Steven B. "Beaux" Jones (Bar # 33915)
Ryan M. Seidemann (Bar #28991)
Elizabeth B. Murrill (Bar #20685)
Wilbur L. Stiles, III (Bar #27654)
Assistant Attorneys General
Louisiana Department of Justice
1185 North 3rd Street
Baton Rouge, Louisiana 70802
Telephone No.: (225) 326-6085
Facsimile: (225) 326-6099
Attorneys for the State of Louisiana



Jeff Landry
Attorney General

State of Louisiana

DEPARTMENT OF JUSTICE
CIVIL DIVISION
P.O. BOX 94005
BATON ROUGE
70804-9005

March 28, 2016

Honorable Carl E. Broussard
Clerk of Court
Cameron Parish, 38th JDC
P.O. Box 549
Cameron, LA 70631

By US Mail

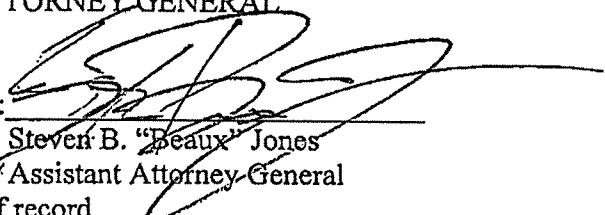
Re: Parish of Cameron v. BEPCO, L.P., et al., No.10-19572
Parish of Cameron v. Brammer Engineering, Inc., et al., No.10-19573
Parish of Cameron v. Ballard Exploration Co., et al., No.10-19574
Parish of Cameron v. Burlington Resources Oil and Gas Co., et al., No.10-19575
Parish of Cameron v. BP America Production Co., et al., No.10-19576
Parish of Cameron v. Atlantic Richfield Co., et al., No.10-19577
Parish of Cameron v. Anadarko E&P Onshore LLC, et al., No.10-19578
Parish of Cameron v. Apache Corporation of Delaware, et al., No.10-19579
Parish of Cameron v. Alpine Exploration, Inc. et al., No.10-19580
Parish of Cameron v. Bay Coquille, Inc., et al., No.10-19581
~~Parish of Cameron v. Auster Oil & Gas, et al., No.10-19582~~

Dear Sir:

I am enclosing herewith an original and one (1) copy of the State's Proposed Order to Vacate Judge Richard's Order to be filed in the above-referenced matters. Please file the original into the record and return a date-stamped copy for my files in the enclosed self-addressed, postage-prepaid envelope. If you have any questions regarding this matter, please feel free to contact me at (225) 326-6085. Thank you in advance for your courtesies. Inasmuch as this request is being made on behalf of the State of Louisiana, no court costs are due.

Sincerely,

JEFF LANDRY
ATTORNEY GENERAL

By: 
Steven B. "Beaux" Jones
Assistant Attorney General

JL/SBJ/tp: Enclosures: cc: All known counsel of record

THIRTY EIGHTH JUDICIAL DISTRICT COURT RECEIVED & FILED

PARISH OF CAMERON 2016 MAR 28 PM 2 22

STATE OF LOUISIANA CLERK OF COURT
CAMERON PARISH, LA.

NO. 10-19582

THE PARISH OF CAMERON

VS

AUSTER OIL & GAS, INC., ET AL.

DATE FILED: _____ DEPUTY CLERK: _____

RULE TO SHOW CAUSE

MAY IT PLEASE THE COURT:

CONSIDERING the Petition for Intervention and the Attorney General's request to supersede the Parish's Attorneys filed on March 14, 2016, by the State of Louisiana, *ex rel.* Jeff Landry, Attorney General,

IT IS HEREBY ORDERED that pursuant to La. Const. Art. IV § 8, the Attorney General's request to supersede the Parish's Attorneys be and hereby is set for hearing on the 25th day of April 2016, at 10:00 o'clock a.m.

Cameron, Louisiana, this 1st day of April, 2016.

Penelope Richard
Judge Penelope Q. Richard
38th Judicial District Court

4-4 20 16
I hereby certify that a copy of the foregoing notice was this day mailed by me to the counsel of record for all parties and to such of the litigants, is any, who are not represented by counsel, which notices were addressed to them respectively, at their last known addresses, with postage prepaid,

Dr
By Clerk of Court

Steven Jones
John Camouche
Respectfully Submitted,
Chad Mudd
JEFF LANDRY
ATTORNEY GENERAL

BY: [Signature]
Steven B. "Beaux" Jones (#33915)
Assistant Attorney General

PLEASE HOLD SERVICE



Jeff Landry
Attorney General

State of Louisiana
DEPARTMENT OF JUSTICE
CIVIL DIVISION
P.O. BOX 94005
BATON ROUGE
70804-9005

March 23, 2016

Honorable Carl E. Broussard
Clerk of Court
Cameron Parish, 38th JDC
P.O. Box 549
Cameron, LA 70631

By US Mail

Re: Parish of Cameron v. BEPCO, L.P., et al., No.10-19572
Parish of Cameron v. Brammer Engineering, Inc., et al., No.10-19573
Parish of Cameron v. Ballard Exploration Co., et al., No.10-19574
Parish of Cameron v. Burlington Resources Oil and Gas Co., et al., No.10-19575
Parish of Cameron v. BP America Production Co., et al., No.10-19576
Parish of Cameron v. Atlantic Richfield Co., et al., No.10-19577
Parish of Cameron v. Anadarko E&P Onshore LLC, et al., No.10-19578
Parish of Cameron v. Apache Corporation of Delaware, et al., No.10-19579
Parish of Cameron v. Alpine Exploration, Inc. et al., No.10-19580
Parish of Cameron v. Bay Coquille, Inc., et al., No.10-19581
Parish of Cameron v. Auster Oil & Gas, et al., No.10-19582

Dear Sir:

I am enclosing herewith an original and one (1) of a Rule to Show Cause to be filed in the above-referenced matters. Please file the original into the record and return a date-stamped copy for my files in the enclosed self-addressed, postage-prepaid envelope. If you have any questions regarding this matter, please feel free to contact me at (225) 326-6085. Thank you in advance for your courtesies. Inasmuch as this request is being made on behalf of the State of Louisiana, no court costs are due.

Sincerely,

JEFF LANDRY
ATTORNEY GENERAL

By: 

Steven B. "Beaux" Jones
Assistant Attorney General

JL/SBJ/tp: Enclosures: cc: All known counsel of record

THIRTY EIGHTH JUDICIAL DISTRICT COURT

RECEIVED & FILED

PARISH OF CAMERON 2016 MAR 31 PM 3 27

STATE OF LOUISIANA

NO. 10-19582

CLERK OF COURT
CAMERON, LOUISIANA

THE PARISH OF CAMERON

VS

AUSTER OIL & GAS, INC., ET AL.

DATE FILED: _____

DEPUTY CLERK: _____

ORDER

MAY IT PLEASE THE COURT:

CONSIDERING the request by the State of Louisiana and subsequent filing of a Rule to Show Cause regarding the Attorney General's request to supersede the Parish's Attorney's pursuant to La. Const. Art. IV, §8,

IT IS HEREBY ORDERED that the Court's Ex Parte Order granting the Attorney General's request to supersede is HEREBY VACATED.

Cameron, Louisiana, this 1st day of April, 2016.

Penelope Richard
Judge Penelope Q. Richard
38th Judicial District Court

4-4 20 16
I hereby certify that a copy of this order and notice was this day mailed by first class mail of record for all parties and to all litigants, is any, who are not represented by counsel, which notices were addressed respectively, at their last known address with postage prepaid.

db
By Clerk of Court

Steven Jones
Chad Mudd
John Carmouche

Respectfully Submitted,

JEFF LANDRY
ATTORNEY GENERAL

BY: [Signature]
Steven B. "Beaux" Jones (#33915)
Assistant Attorney General

Office of the Governor
State of Louisiana

JOHN BEL EDWARDS
GOVERNOR



P.O. Box 94004
BATON ROUGE, LOUISIANA 70804-9004
(225) 342-7015
GOV.LA.GOV

April 7, 2016

Honorable Cynthia P. King
Clerk of Court - Cameron Parish
Post Office Box 549
Cameron, LA 70631-0549

RE: The Parish of Cameron v. Auster Oil and Gas, Inc., et al.
Number: 10-19582, 38th JDC, Cameron
Our File Number 00060

Dear Ms. King:

Enclosed are an original and one copy of a Petition in Intervention to be filed on behalf of State of Louisiana, through the Louisiana Department of Natural Resources, Office of Coastal Management and its Secretary, Thomas F. Harris in the above matter.

Please file the original, date-stamp the copy and return it to me in the enclosed self-addressed, stamped envelope. It is my understanding that there are no filing fees due at this time since the filer is a State entity. ~~Please hold service at this time.~~

If you have any questions, please give me a call (225) 342-8212 or email (sherry.lassere@la.gov). With kindest regards, I remain

Very truly yours,

A handwritten signature in black ink, appearing to read "Sherry G. Lassere".

Sherry G. Lassere, CP
Assistant to Executive Counsel
to the Governor, Matthew F. Block

enclosures

THE PARISH OF CAMERON

NUMBER: 10-19582

VERSUS

RECEIVED & FILED

2016 APR 13 AM 10 41

CLERK OF COURT
CAMERON PARISH, LA.

38TH JUDICIAL DISTRICT COURT

AUSTER OIL AND GAS, INC., APACHE OIL CORPORATION, BP AMERICA PRODUCTION COMPANY, CHEVRON PIPE LINE COMPANY, CHEVRON U.S.A. HOLDINGS, INC., CHEVRON U.S.A., INC., DARSEY OPERATING CORPORATION, ENERVEST OPERATING, L.L.C., EXXON MOBIL CORPORATION, FREEPORT SULPHUR COMPANY, GULFPORT ENERGY CORPORATION, HILCORP ENERGY COMPANY, HONEYWELL INTERNATIONAL, INC., KERR-MCGEE OIL AND GAS ONSHORE LP, RESOURCE SECURITIES CORPORATION, SAMUEL GARY JR. & ASSOCIATES, INC., SHELL OFFSHORE, INC., SHELL OIL COMPANY, STAR ENERGY, INC., SWEPI LP, TAYLOR ENERGY COMPANY LLC, TEXAS PACIFIC OIL COMPANY, INC., TEXAS PETROLEUM INVESTMENT COMPANY, THE TEXAS COMPANY, TRANSCONTINENTAL OIL CORPORATION AND VERNON E. FAULCONER, INC.

PARISH OF CAMERON

STATE OF LOUISIANA

PETITION IN INTERVENTION OF THE STATE OF LOUISIANA,
THROUGH THE DEPARTMENT OF NATURAL RESOURCES,
OFFICE OF COASTAL MANAGEMENT

NOW INTO COURT, through undersigned counsel, come the State of Louisiana, through the Louisiana Department of Natural Resources, Office of Coastal Management and its Secretary, Thomas F. Harris, who respectfully represent as follows and request the Court allow this intervention:

1.

Louisiana Code of Civil Procedure article 1091 provides:

A third person having an interest therein may intervene in a pending action to enforce a right related to or connected with the object of the pending action against one or more of the parties thereto by:

- (1) Joining with plaintiff in demanding the same or similar relief against the defendant;
- (2) United with defendant in resisting the plaintiff's demand; or
- (3) Opposing both plaintiff and defendant.

2.

A two-fold inquiry has developed in Louisiana's jurisprudence regarding the requirements for intervention: first, the intervenor must have a justiciable interest in, and a connection to, the principle action. *Palace Props., L.L.C. v. City of Hammond*, (La.App. 1 Cir. 6/27/2003), 859 So.2d 15, 20, citing *Niemann v. American Gulf Shipping, Inc.*, 96-687, p. 6 (La.App. 5 Cir. 1/15/97), 688 So.2d 42, 45, writ denied 97-0404, (La. 3/27/97). 692 So.2d 397. The First Circuit, in *Amoco Production Company v.*

Columbia Gas Transmission Corporation, 455 So.2d 1260, 1264 (La.App. 1 Cir. 8/31/1984), defined “justiciable right” in the context of an intervention as “the right of a party to seek redress or a remedy against either plaintiff or defendant in the original action or both....” As to the second inquiry, the court further held that the justiciable right must be “so related or connected to the facts or object of the principal action that a judgment on the principal action will have a direct impact on the intervenor’s rights.” *Id.* As set forth in more detail below, Louisiana law provides the State of Louisiana, through the Louisiana Department of Natural Resources (“DNR”), Office of Coastal Management (“OCM”) with concurrent authority to enforce the provisions of law at issue in the current matter, thereby satisfying the justiciable interest prong. Moreover, that interest is directly connected to the principal action because any judgment issued in that action is subject to the requirements of La. R.S. 49:214.36(O), which requires monies received by a parish be used for integrated coastal protection. Consequently, DNR/OCM has a right to intervene in this proceeding in order to protect the rights of the State pursuant to their respective areas of statutory authority.

3.

Interventions must also be timely, in accordance with La. Code of Civ. Proc. art. 1031 and 1033. As an incidental demand under La. C.C.P. art. 1031, a petition for intervention can be filed without leave of court at any time up to and including the time the answer to the principal demand is filed. It may be filed after an answer, with leave of court, if it will not retard the progress of the principal action. La. C.C.P. art. 1033. The First Circuit Court of Appeal has held that, “[a]n intervention may be filed only while suit is pending and before judgment on the main demand.” *Van Lieu v. Winn-Dixie of Louisiana, Inc.*, 446 So.2d 1362, 1366 (La.App. 1 Cir. 1984). Courts have great discretion in deciding whether to allow an intervention if such intervention will not retard the progress of the main demand. *See Madere v. Lennix*, 535 So.2d 1290 (La.App. 5 Cir. 1988), *citing Volume Shoe Corp. v. Armato*, 341 So.2d 611 (La.App. 2 Cir. 1977).

BACKGROUND

4.

On November 8, 2013, Cameron Parish and the State of Louisiana, *ex rel.* Parish of Cameron filed a Petition for Damages to the Cameron Parish Coastal Zone (the “Petition”) against several oil and gas exploration, production, and transportation operations seeking damages for destruction to coastal land and waterbodies allegedly caused by the Defendants activities. The Plaintiffs specifically seek damages as provided in the State and Local Coastal Resources Management Act of 1978, La. R.S. 49:214.21, *et seq.* (“SLCRMA”), the payment of restoration costs, and actual restoration of the Cameron Parish Coastal Zone.

5.

On December 18, 2013, the Defendants removed the state court action to the federal district court for the Eastern District of Louisiana alleging original jurisdiction based on diversity jurisdiction, Outer Continental Shelf Lands Act, general maritime law, and federal question jurisdiction. The Parish quickly moved to remand the matter back to state court, and on December 1, 2014, the court granted the Parish's motion remanding the matter to state court. No answers have to date been filed in this action.

6.

On March 14, 2016, Attorney General Jeff Landry intervened in this matter, along with all other similar suits seeking recovery under La. R.S. 49:214.21, *et seq.* This intervention by the State of Louisiana through DNR/OCM, in concert with the intervention filed by the Attorney General, ensures that the State of Louisiana's interests will be fully protected in this matter, and that any funds resulting from this litigation will be properly spent on restoring Louisiana's coast.

LEGAL FRAMEWORK

7.

The Louisiana Department of Natural Resources ("DNR") is an executive branch agency of the state and is responsible for the conservation, management, and development of water, minerals, and other such natural resources of the state, including coastal management. La. R.S. 36:351(A). The Office of Coastal Management is created within DNR and is charged with performing the functions of the state relative to the coastal zone management program. La. R.S. 36:358; *see also* La. R.S. 49:214.26 (establishing a coastal zone program within DNR and authorizing the Secretary of DNR or his designee to administer the program).

8.

Louisiana Constitution Article IX, Section 1 provides, in pertinent part:

The natural resources of the state, including the air and water, and the healthful, scenic, historic, and esthetic quality of the environment shall be protected, conserved, and replenished insofar as possible and consistent with the health, safety, and welfare of the people. The legislature shall enact laws to implement this policy.

9.

The Louisiana Legislature, in 1978, enacted the State and Local Coastal Resources Management Act ("SLCRMA") (Act 361 of 1978, codified at La. R.S. 49:214.21, *et seq.*) (*i.e.* the Louisiana Coastal Zone Management Program), in order to balance conservation and development within Louisiana's coastal zone. SLCRMA is one of the public trust laws enacted by the legislature pursuant to La. Const. art. IX, sec. 1.

10.

In August 1980, Louisiana's coastal management program, the Louisiana Coastal Resources Program ("LCRP"), was approved by the National Oceanic and Atmospheric Administration ("NOAA"), U.S. Department of Commerce, under section 306 of the Coastal Zone Management Act (16 U.S.C. § 1455(d)).

11.

Pursuant to the SLCRMA, in 1980, DNR adopted, and the legislature and the governor approved, the Louisiana Coastal Use Guidelines. *See* LAC 43:I.701-719. The enforceable policies of the LCRP, as approved by NOAA, include, but are not limited to, the 94 Coastal Use Guidelines adopted by the State, as well as Article IX, Section 1 of the Louisiana Constitution.

12.

In enacting SLCRMA, the legislature declared that it was the public policy of the State:

- (1) To protect, develop, and, where feasible, restore or enhance the resources of the state's coastal zone.

- (5) To develop and implement a coastal resources management program which is based on consideration of our resources, the environment, the needs of the people of the state, the nation, and of state and local government.
- (6) To enhance opportunities for the use and enjoyment of the recreational values of the coastal zone.
- (7) To develop and implement a reasonable and equitable coastal resources management program with sufficient expertise, technical proficiency, and legal authority to enable Louisiana to determine the future course of development and conservation of the coastal zone and to ensure that state and local governments have the primary authority for managing coastal resources.
- (8) To support sustainable development in the coastal zone that accounts for potential impacts from hurricanes and other natural disasters and avoids environmental degradation resulting from damage to infrastructure caused by natural disasters.

La. R.S. 49:214.22.

13.

Under the SLCRMA, there are two types of coastal uses: uses of State concern and uses of local concern. Uses of State concern are those uses that directly and significantly affect coastal waters and which are in need of coastal management and which have impacts of greater than local significance or which significantly affect interest of regional, state, or national concern. La. R.S. 49:214.25. Prior to commencing a use of the coastal zone, an applicant must first apply for and receive a coastal use permit ("CUP"). La. R.S. 49:214.30. The secretary of DNR ("Secretary") is designated to make decisions on coastal use permit applications for uses of State concern, whereas the local government makes decisions

as to uses of local concern in areas where an approved local program is in effect. Prior to issuing a CUP, the Secretary must ensure that the activity for which the application is being made is consistent with the State's Comprehensive Master Plan for Integrated Coastal Protection ("Master Plan") and with the Coastal Use Guidelines. *Id. See also* LAC: 43.I.701, *et seq.*

14.

DNR/OCM is given specific, non-exclusive authority to enforce SLCRMA and the LCRP. La. R.S. 49:214.36(D) provides that the Secretary "may bring such injunctive, declaratory, or other actions as are necessary to ensure that no uses are made of the coastal zone for which a CUP has not been issued when required or which are not in accordance with the terms and conditions of a coastal use permit." According to La. R.S. 49:214.36(E), "[a] court may impose civil liability and assess damages; order, where feasible and practical, the payment of restoration costs; require, where feasible and practical, actual restoration of the areas disturbed; or otherwise impose reasonable and proper sanctions for uses conducted within the coastal zone...[t]he court may also award costs and attorney's fees to the prevailing party."

15.

Act No. 544 of the 2014 Regular Session of the Louisiana Legislature ("Act 544") added subsection (O) to La. R.S. 49:214.36 to provide that the only state or local governmental entity rights or causes of action arising from any activity subject to the permitting of SLCRMA are those outlined in that law. Act 544 further provided that "[a]ny monies received by any state or local governmental entity arising from or related to a state or federal permit issued pursuant to R.S. 49:214.21, *et seq.* ... a violation thereof, or enforcement thereof, or for damages or other relief arising from or related to...**shall be used for integrated coastal protection, including coastal restoration, hurricane protection, and improving the resiliency of the coastal area.**" Act 544 applies to all claims existing or pending on the effective date of the Act, which was June 6, 2014.

16.

"Integrated coastal protection" is not defined in SLCRMA; however, it is defined in La. R.S. 49:214.2, as follows:

"Integrated coastal protection" means plans, projects, policies, and programs intended to provide hurricane protection or coastal conservation or restoration, and shall include but not be limited to coastal restoration; coastal protection; infrastructure; storm damage reduction; flood control; water resources development; erosion control measures; marsh management; diversions; saltwater intrusion prevention; wetlands and central wetlands conservation, enhancement, and restoration; barrier island and shoreline stabilization and preservation; coastal passes stabilization and restoration; mitigation; storm surge reduction; or beneficial use projects.

17.

Many of the activities asserted by Cameron Parish in its Petition to have caused the damages alleged are included within the list of activities for which a coastal use permit must be issued, including, but not limited to: (1) dredge and fill activity which intersects with more than one water body; (2) all mineral activities, including exploration for and production of, oil, gas, and other minerals, all dredge and fill uses associated therewith, and all other associated uses; and, (3) all pipelines for the gathering, transportation or transmission of oil, gas, and other materials. *See* La. R.S. 49:214.25(A); *see also* Plaintiff's Petition, ¶ 19 – 25.

18.

The Parish has specifically included a list of the coastal use permits known to have been issued within the area of the complained-of activity that forms the basis of the lawsuit. *See* Plaintiff's Petition, ¶ 7 and Exhibit D.

19.

Cameron Parish has prayed for damages, restoration costs, and actual restoration in areas of the coastal zone subject to SLCRMA. As such, DNR's authority to enforce SLCRMA and seek the payment of restoration costs or require actual restoration of areas disturbed overlaps with the relief requested by Parish. More importantly, Act 544 requires that any monies received by a local governmental entity arising from or related to a coastal use permit, the enforcement of SLCRMA, or related to any use of the coastal zone subject to SLCRMA be used for integrated coastal protection. Thus, intervention is necessary to ensure that the State of Louisiana's interests, through the statutory authority of DNR/OCM, are fully protected and that in the event that the Parish is awarded any damages or other relief, restoration is achieved in a manner consistent with state law, including but not limited to Part II of Title 49 of the Louisiana Revised Statutes – Louisiana Coastal Protection, Conservation, Restoration, and Management.

20.

The legislature gave both DNR and local governmental entities with approved local coastal management programs the authority to enforce SLCRMA with respect to coastal use permits issued by those entities, as well as for uses for which a coastal use permit has not been issued when required or which are not in accordance with the terms and conditions of such permit. La. R.S. 49:214.36.

21.

Likewise, the legislature also provided for the mission of the state as it relates to integrated coastal protection, stating:

The state must act to develop, implement, and enforce a comprehensive integrated coastal protection plan. The state must act to ensure that the plan incorporates a systems approach to integrate hurricane protection and coastal restoration efforts in order to achieve long-term and comprehensive integrated coastal protection. Comprehensive integrated coastal protection must proceed in a manner that recognizes that the proper functioning of each protective element is critical to the overall success of the plan and that without such proper functioning the safety of the state and its citizens and the viability of the entire plan are threatened. Further, comprehensive integrated coastal protection must proceed in a manner that recognizes the powers and duties of political subdivisions, including flood protection authorities, and levee districts, to fund and manage local activities that are consistent with the goals of a comprehensive integrated coastal protection plan. The state must act to conserve, restore, create, and enhance wetlands and barrier shorelines or reefs in coastal Louisiana while encouraging use of coastal resources and recognizing that it is in the public interest of the people of Louisiana to establish a responsible balance between development and conservation. Management of renewable coastal resources must proceed in a manner that is consistent with and complementary to the efforts to establish a proper balance between development and conservation.

La. R.S. 49:214.1(C).

22.

This statutory scheme makes clear that, while the parishes have certain missions, powers, and duties pursuant to SLCRMA, the state, through the designated executive branch agencies and offices, is also charged with conserving and restoring Louisiana's coast and developing and implementing policies, plans, and programs to achieve comprehensive integrated coastal protection *statewide*. Thus, state and local governmental entities are charged with acting in coordination and cooperation with each other in performing coastal restoration and hurricane protection. And while the state is tasked with the authority to "articulate a clear statement of priorities and to focus development and implementation of efforts to achieve comprehensive integrated coastal protection," La. R.S. 49:214.1(B), the independent authority of local governmental entities, including parishes, flood protection authorities, political subdivisions, and levee districts has also been maintained.

23.

Considering the constitutional and statutory structure set forth in Louisiana law, the executive branch agencies and offices responsible for the enforcement of the coastal zone management program and coastal protection and restoration have a real interest in ensuring the continued coordination of integrated coastal protection activities. The Louisiana Department of Natural Resources, Office of Coastal Management files this intervention in order to assert and protect those interests.

24.

The defendants are required to comply with all applicable state laws and regulations, including but not limited to SLCRMA. The defendants are also charged with complying with all terms and conditions of their coastal use permits issued pursuant to SLCRMA. To the extent there was a failure by the defendants to obtain permits required by law or to comply with the terms and conditions of their

coastal use permits, there has been a violation of SLCRMA, subjecting the defendants to enforcement pursuant to La. R.S. 49:214.36.

25.

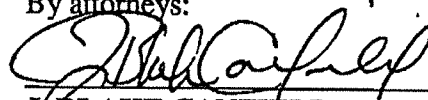
Louisiana Revised Statute 49:214.36 authorizes the assessment of damages, the payment of restoration costs, and actual restoration upon a determination of liability under SLCRMA, and La. R.S. 49:214.36(O) requires that recoverable damages be spent on integrated coastal protection.

PRAYER FOR RELIEF

WHEREFORE, the State of Louisiana through the Louisiana Department of Natural Resources, Office of Coastal Management and the Secretary of DNR, Thomas F. Harris, moves to intervene in this matter and pray that it be permitted to proceed as a party to this action, that after all parties have been duly cited to appear and answer and have been served with a copy of this Intervention, there be judgment in favor of Intervenor:

- (1) That any party or parties found to be liable for violations of SLCRMA be assessed damages, the payment of restoration costs, and actual restoration of the coastal area, in addition to any other appropriate relief authorized by the State Local Coastal Resources Management Act, La. R.S. 49:214.21, *et seq.*, in accordance with La. R.S. 49:214.36 and specifically section 214.36(O);
- (2) Ordering that any judgment requiring actual restoration of lands within the coastal area be consistent with La. R.S. 49:214.21, *et seq.*, and specifically La. R.S. 49:214.36(O), as well as the Hurricane Protection, Flood Control and Coastal Restoration Act, which requires that restoration be used for, and be consistent with, comprehensive integrated coastal protection, including hurricane protection, coastal conservation, or coastal restoration; and
- (3) Ordering the payment of costs, reasonable attorneys' fees, and for full, general, and equitable relief pursuant to Louisiana law.

By attorneys:



J. BLAKE CANFIELD (#30426)

Executive Counsel

Department of Natural Resources

Post Office Box 94396

Baton Rouge, Louisiana 70804

(225) 342-2710 / (225) 342-5861 (fax) blake.canfield@la.gov



MEGAN K. TERRELL (Bar #29443)

Office of Governor John Bel Edwards

Governor's Office for Coastal Activities

900 North 3rd Street, Fourth Floor

Baton Rouge, Louisiana 70802

(225) 342-7669 / (225) 342-7099 (fax) megan.terrell2@la.gov

TALBOT, CARMOUCHE & MARCELLO

DONALD T. CARMOUCHE
VICTOR L. MARCELLO
JOHN H. CARMOUCHE
*Member of the Texas Bar

17405 PERKINS ROAD
BATON ROUGE, LOUISIANA 70810
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WILLIAM R. COENEN, III
BRIAN T. CARMOUCHE
TODD J. WIMBERLEY
ROSS J. DONNES
D. ADELE OWEN
LEAH COTTEN

April 20, 2016

AUBERT D. TALBOT
(1925-2005)

TO: Cameron Parish Clerk of Court
Attn: Debbie
337-775-7172

FROM: John H. Carmouche

NUMBER OF PAGES: 6
(INCLUDING COVER SHEET)

RE: Cameron Parish v. Auster Oil & Gas, Inc., et al.
Docket No. 10-19582 (Hackberry)
38th JDC; Parish of Cameron; State of Louisiana

| DOCUMENTS | NUMBER OF PAGES |
|--|-----------------|
| Cover letter for service for Original Petition for Damages | 5 |
| | |
| | |

Please file the attached into the record today and confirm that you received this fax transmission. The original will be forwarded to your office within five days along with a check for your services. If you should have any questions, please call.

If you have any problems with this fax transmission, please call 225-400-9991.

CONFIDENTIALITY NOTICE

This facsimile transmission (and/or the documents accompanying it) may contain confidential information belonging to the sender which is protected by the attorney-client privilege. The information is intended only for the use of the individual or entity named above. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution or the taking of any action in reliance on the contents of this information is strictly prohibited. you have received this transmission in error, please immediately notify us by telephone to arrange for the return of the documents.

TALBOT, CARMOUCHE & MARCELLO

DONALD T. CARMOUCHE
VICTOR L. MARCELLO
JOHN H. CARMOUCHE

*Member of the Texas Bar

17405 PERKINS ROAD
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WILLIAM R. COENEN, III
BRIAN T. CARMOUCHE
TODD J. WIMBERLEY
ROSS J. DONNES
D. ADELE OWEN
LEAH C. POOLE

AUBERT D. TALBOT
(1925-2005)

April 22, 2016

VIA HAND DELIVERY

Honorable Cynthia P. King
Cameron Parish Clerk of Court
122 Recreation Lane
Post Office Box 459
Cameron, LA 70631-0549

Re: Cameron Parish v. Auster Oil & Gas, Inc., et al.
Docket No. 10-19582 (Hackberry)
38th JDC; Parish of Cameron; State of Louisiana

Dear Ms. King:

Please effect service of the Original Petition for Damages with regard to the referenced manner as follows:

1. **AUSTER OIL AND GAS, INC.**
Through its registered agent for service of process:
John A. Hogan
2036 Olene Drive
Sulphur, LA 70663
2. **APACHE OIL CORPORATION**
✓ Through its registered agent for service of process:
C T Corporation System
350 N. Paul Street, Suite 2900
Dallas, TX 75201
3. **BP AMERICA PRODUCTION COMPANY**
Through its registered agent for service of process:
C T Corporation System
5615 Corporate Blvd., Suite 400B
Baton Rouge, LA 70808
4. **CHEVRON PIPE LINE COMPANY**
Through its registered agent for service of process:
The Prentice-Hall Corporation System, Inc.
320 Somerulos Street
Baton Rouge, LA 70802

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2016 APR 21 AM 10 26
CLERK OF COURT
CAMERON PARISH, LA.

Cynthia P. King
Page 2

5. **CHEVRON U.S.A. HOLDINGS, INC.**

Through its registered agent for service of process:
Angie Wang c/o ChevronTexaco
✓ P.O. Box 6028
San Ramon, CA 94583

6. **CHEVRON U.S.A. INC.**

Through its registered agent for service of process:
The Prentice-Hall Corporation System, Inc.
320 Somerulos Street
Baton Rouge, LA 70802

7. **DARSEY OPERATING CORPORATION**

Through its registered agent for service of process:
William G. Darsey, III
120 Rue Beauregard, Suite 100
Lafayette, LA 70505

8. **ENERVEST OPERATING, L.L.C.**

Through its registered agents for service of process:
C T Corporation System
5615 Corporate Blvd., Suite 400B
Baton Rouge, LA 70808

9. **EXXON MOBIL CORPORATION**

Through its registered agent for service of process:
Corporation Service Company
320 Somerulos Street
Baton Rouge, LA 70802

10. **FREEPORT SULPHUR COMPANY**

Through its registered agent for service of process:
Corporation Service Company
320 Somerulos Street
Baton Rouge, LA 70802

11. **GULFPORT ENERGY CORPORATION**

Through its registered agent for service of process:
✓ David L. Patron
Phelps Dunbar LLP
365 Canal Street, Suite 2000
New Orleans, LA 70130-6534

Cynthia P. King
Page 4

19. STAR ENERGY, INC.

Through its registered agent for service of process:
W. Miguel Swanwick
121 River Drive
Lafayette, LA 70503

20. SWEPI LP

✓ Through its registered agent for service of process:
C T Corporation System
5615 Corporate Blvd., Suite 400B
Baton Rouge, LA 70808

21. TAYLOR ENERGY COMPANY LLC

✓ Through its registered agent for service of process:
Paul J. Goodwine
Looper Goodwine & Ballew
601 Poydras Street, Suite 2200
New Orleans, LA 70130

22. TEXAS PACIFIC OIL COMPANY, INC.

✓ Through its registered agent for service of process:
C T Corporation System
5615 Corporate Blvd., Suite 400B
Baton Rouge, LA 70808

23. TEXAS PETROLEUM INVESTMENT COMPANY

✓ Through its registered agent for service of process:
Patrick S. Ottinger
1313 W. Pinhook Road
Lafayette, LA 70503

24. THE TEXAS COMPANY

Through its registered agent for service of process:
The Prentice-Hall Corporation System, Inc.
320 Somerulos Street
Baton Rouge, LA 70802

25. TRANSCONTINENTAL OIL CORPORATION

Through its registered agent for service of process:
C T Corporation System
5615 Corporate Blvd., Suite 400B
Baton Rouge, LA 70808

Cynthia P. King
Page 5

26. VERNON E. FAULCONER

Through its registered agent for service of process:
C T Corporation System
5615 Corporate Blvd., Suite 400B
Baton Rouge, LA 70808

Also enclosed is a check which represents the filing and service fees.

With kindest regards, I am

Very truly yours,

John H. Carmouche

JHC/sls
Enclosures
cc: via e-mail only
Chad Mudd
Keith Prudhomme
David P. Bruchhaus
Matthew P. Keating

TALBOT, CARMOUCHE & MARCELLO

DONALD T. CARMOUCHE
VICTOR L. MARCELLO
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*Member of the Texas Bar

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LEAH C. POOLE

AUBERT D. TALBOT
(1925-2005)

April 22, 2016

VIA HAND DELIVERY

Honorable Cynthia P. King
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122 Recreation Lane
Post Office Box 459
Cameron, LA 70631-0549

Re: Cameron Parish v. Auster Oil & Gas, Inc., et al.
Docket No. 10-19582 (Hackberry)
38th JDC; Parish of Cameron; State of Louisiana

Dear Ms. King:

Please effect service of the Original Petition for Damages with regard to the referenced manner as follows:

1. **AUSTER OIL AND GAS, INC.**
Through its registered agent for service of process:
John A. Hogan
2036 Olene Drive
Sulphur, LA 70663
2. **APACHE OIL CORPORATION**
Through its registered agent for service of process:
C T Corporation System
350 N. Paul Street, Suite 2900
Dallas, TX 75201
3. **BP AMERICA PRODUCTION COMPANY**
Through its registered agent for service of process:
C T Corporation System
5615 Corporate Blvd., Suite 400B
Baton Rouge, LA 70808
4. **CHEVRON PIPE LINE COMPANY**
Through its registered agent for service of process:
The Prentice-Hall Corporation System, Inc.
320 Somerulos Street
Baton Rouge, LA 70802

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5. **CHEVRON U.S.A. HOLDINGS, INC.**
Through its registered agent for service of process:
Angie Wang c/o ChevronTexaco
P.O. Box 6028
San Ramon, CA 94583
6. **CHEVRON U.S.A. INC.**
Through its registered agent for service of process:
The Prentice-Hall Corporation System, Inc.
320 Somerulos Street
Baton Rouge, LA 70802
7. **DARSEY OPERATING CORPORATION**
Through its registered agent for service of process:
William G. Darsey, III
120 Rue Beauregard, Suite 100
Lafayette, LA 70505
8. **ENERVEST OPERATING, L.L.C.**
Through its registered agents for service of process:
C T Corporation System
5615 Corporate Blvd., Suite 400B
Baton Rouge, LA 70808
9. **EXXON MOBIL CORPORATION**
Through its registered agent for service of process:
Corporation Service Company
320 Somerulos Street
Baton Rouge, LA 70802
10. **FREEPORT SULPHUR COMPANY**
Through its registered agent for service of process:
Corporation Service Company
320 Somerulos Street
Baton Rouge, LA 70802
11. **GULFPORT ENERGY CORPORATION**
Through its registered agent for service of process:
David L. Patron
Phelps Dunbar LLP
365 Canal Street, Suite 2000
New Orleans, LA 70130-6534

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Page 3

12. HILCORP ENERGY COMPANY

Through its registered agent for service of process:
CT Corporation System
5615 Corporate Blvd., Suite 400B
Baton Rouge, LA 70808

13. HONEYWELL INTERNATIONAL INC.

Through its registered agent for service of process:
Corporation Service Company
320 Somerulos Street
Baton Rouge, LA 70802

14. KERR-MCGEE OIL AND GAS ONSHORE LP

Through its registered agent for service of process:
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5615 Corporate Blvd., Suite 400B
Baton Rouge, LA 70808

15. RESOURCE SECURITIES CORPORATION

Through its registered agent for service of process:
Wayne Hyman
124 Oak Coullee Drive
Lafayette, LA 70507

16. SAMUEL GARY JR. & ASSOCIATES, INC.

Through its registered agent for service of process:
C T Corporation System
5615 Corporate Blvd., Suite 400B
Baton Rouge, LA 70808

17. SHELL OFFSHORE INC.

Through its registered agent for service of process:
C T Corporation System
5615 Corporate Blvd., Suite 400B
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18. SHELL OIL COMPANY

Through its registered agent for service of process:
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5615 Corporate Blvd., Suite 400B
Baton Rouge, LA 70808

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Page 4

19. **STAR ENERGY, INC.**

Through its registered agent for service of process:
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Lafayette, LA 70503

20. **SWEPI LP**

Through its registered agent for service of process:
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21. **TAYLOR ENERGY COMPANY LLC**

Through its registered agent for service of process:
Paul J. Goodwine
Looper Goodwine & Ballew
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22. **TEXAS PACIFIC OIL COMPANY, INC.**

Through its registered agent for service of process:
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23. **TEXAS PETROLEUM INVESTMENT COMPANY**

Through its registered agent for service of process:
Patrick S. Ottinger
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24. **THE TEXAS COMPANY**

Through its registered agent for service of process:
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25. **TRANSCONTINENTAL OIL CORPORATION**

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Cynthia P. King
Page 5

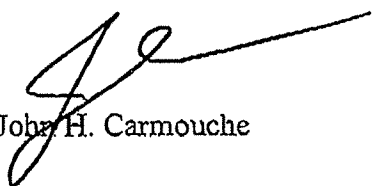
26. **VERNON E. FAULCONER**

Through its registered agent for service of process:
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Also enclosed is a check which represents the filing and service fees.

With kindest regards, I am

Very truly yours,



John H. Carmouche

JHC/sls
Enclosures
cc: via e-mail only
Chad Mudd
Keith Prudhomme
David P. Bruchhaus
Matthew P. Keating

Office of the Governor
State of Louisiana

JOHN BEL EDWARDS
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April 7, 2016

Honorable Cynthia P. King
Clerk of Court - Cameron Parish
Post Office Box 549
Cameron, LA 70631-0549

RE: The Parish of Cameron v. Auster Oil and Gas, Inc., et al.
Number: 10-19582, 38th JDC, Cameron
Our File Number 00060

Dear Ms. King:

Enclosed are an original and one copy of a Petition in Intervention to be filed on behalf of State of Louisiana, through the Louisiana Department of Natural Resources, Office of Coastal Management and its Secretary, Thomas F. Harris in the above matter.

Please file the original, date-stamp the copy and return it to me in the enclosed self-addressed, stamped envelope. It is my understanding that there are no filing fees due at this time since the filer is a State entity. Please hold service at this time.

If you have any questions, please give me a call (225) 342-8212 or email (sherry.lassere@la.gov). With kindest regards, I remain

Very truly yours,

A handwritten signature in black ink, appearing to read "Sherry G. Lassere".

Sherry G. Lassere, CP
Assistant to Executive Counsel
to the Governor, Matthew F. Block

enclosures

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VIA FAX and U.S. Mail

Cynthia P. King
Clerk of Court
38th Judicial District Court
Parish of Cameron
119 Smith Circle
Room 21
Cameron, Louisiana 70631-0549

Re: *The Parish of Cameron v. Auster Oil and Gas, Inc., et al.*
38th Judicial District Court, Parish of Cameron
Docket No. 10-19582

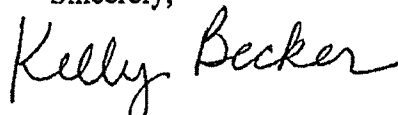
Dear Ms. King:

Enclosed please find a Notice to State Court of Removal filed in the above-captioned matter.

Pursuant to La. R.S. 13:850, we are filing the enclosed by facsimile transmission. Also required by La. R.S. 13:850, we are delivering to you, by U.S. Mail, the original and one copy of the enclosed pleading. We understand that your office will fax to us an invoice for filing costs due. Upon receipt of your invoice, we will forward our firm check to you with the pleading. Please file the pleading in the record and return a date-stamped copy in the enclosed self addressed, stamped envelope to my attention.

Thank you for your assistance and courtesies. If you have any questions, please give me a call.

Sincerely,



Kelly B. Becker

KBB/kge
Enclosure

RECEIVED & FILED

2016 APR 25 PM 4 07

CLERK OF COURT

38TH JUDICIAL DISTRICT COURT FOR THE PARISH OF CAMERON

STATE OF LOUISIANA

CIVIL NO. 10-19582

DIVISION "A"

THE PARISH OF CAMERON

VERSUS

AUSTER OIL AND GAS, INC., ET AL

FAX FILED:

FILED: _____

DEPUTY CLERK

R. Willis

Deputy Clerk of Court

NOTICE OF FILING NOTICE OF REMOVAL

PLEASE TAKE NOTICE that on April 21, 2016, Defendants, Shell Offshore, Inc., Shell Oil Company, SWEPI LP, BP America Production Company, Chevron Pipe Line Company, Chevron U.S.A. Holdings Inc., Chevron U.S.A., Inc., The Texas Company, and Exxon Mobil Corporation ("Defendants") filed in the office of the Clerk of the United States District Court for the Western District of Louisiana, a Notice of Removal of the above action to said United States District Court.

A copy of such Notice of Removal is annexed hereto.

Respectfully submitted,

/s/ Kelly B. Becker

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Facsimile: (504) 636-4000

Attorneys for Exxon Mobil Corporation

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the above and foregoing pleading has been served upon all counsel of record by electronic mail, fax, and/or depositing same in the United States mail, postage prepaid and properly addressed, this 21st day of April, 2016.

/s/ Kelly B. Becker

On February 4, 2016, the Parish of Cameron filed its Original Petition for Damages in the 38th Judicial District Court for the Parish of Cameron (the “Petition”) against Defendants Shell Offshore, Inc., Shell Oil Company, SWEPI LP, BP America Production Company, Chevron Pipe Line Company, Chevron U.S.A. Holdings Inc., Chevron U.S.A., Inc., The Texas Company, and Exxon Mobil Corporation (“Defendants”). Without waiving any of their jurisdictional and other defenses, Defendants respectfully remove this civil action from the 38th Judicial District Court if the Parish of Cameron to the United States District Court for the Western District of Louisiana.

INTRODUCTION

Counsel for the Parish has now filed 39 near-identical lawsuits in 3 coastal parishes. Private landowners have filed 4 follow-on petitions. The Attorney General of Louisiana and the Secretary of the Louisiana Department of Natural Resources have since intervened in all of the parish cases. These lawsuits ask state trial judges to preside over what the Parish views as a referendum on a century of prosperous oil and gas activities in Louisiana’s coastal zone.¹ Neither the parishes nor the state entities see any role for the federal government in this process.

But the Parish cannot avoid the fact that Defendants’ oil and gas activities are a critical component of the nation’s energy security and intersect with federal issues across multiple dimensions. For example, the challenged activities include the dredging and maintenance of navigable waterways and transportation of minerals to and from the outer continental shelf. It is beyond dispute that, if successful, the Louisiana coastal cases could have a seismic effect on

¹ See, e.g., *Board of Comm'rs of the Se. La. Flood Protection Auth. v. Tennessee Gas Pipeline Co., LLC*, 2:13-cv-05410, at *80–81 (E.D. La. June 27, 2014) (order denying remand) (“While Plaintiff may not be expressly challenging a specific action of a federal agency, the breadth of Plaintiff’s claims amounts to a collateral attack on an entire regulatory scheme.... Plaintiff’s claims are premised on the notion that this regulatory framework provides inadequate protection for the residents of southeastern Louisiana, and through this litigation, Plaintiff seeks to have the entire oil and gas industry compensate residents for the shortfall.”).

federal energy policy and regulation of Louisiana's coastal zone. This Court has removal jurisdiction under general maritime law and the Outer Continental Shelf Lands Act ("OCSLA").

It bears noting, however, that the federal jurisdictional questions in this case are shrouded in uncertainty. Previously, the Eastern District of Louisiana remanded the 28 cases that the Parishes' counsel brought in Jefferson and Plaquemines Parishes. Key jurisdictional questions at issue in those cases — including the removability of general maritime and OCS pipeline claims — remain "hotly contested." *See, e.g., Riverside Const. Co. v. Entergy Miss., Inc.*, 626 Fed. App'x 443, 445 (5th Cir. 2015), *as revised* (Oct. 16, 2015). Until the Fifth Circuit clarifies the jurisdictional impact of general maritime claims and OCSLA, uncertainty will cause further protracted battles over removal and remand. This Court should consider ending the uncertainty by asserting jurisdiction and certifying an appeal to the Fifth Circuit under 28 U.S.C. § 1292(b).

REMOVAL PREREQUISITES

Under 28 U.S.C. § 1441(a), "any civil action brought in a State court of which the district courts have original jurisdiction, may be removed by the defendant or defendants, to the district court of the United States for the district and division embracing the place where such action is pending." Because this case satisfies all prerequisites of removal, it belongs in federal court.

Venue. This notice of removal is properly directed to this Court pursuant to § 1441 because this Court is "the district court of the United States for the district and division" within which the State Court Petition is pending. *See* 28 U.S.C. § 98(a).

State Court Record. Pursuant to 28 U.S.C. § 1446(a), Defendants attach as Exhibit I a copy of all process, pleadings, and orders in this action and available in the state court record.

Notice of Removal is Timely. Defendants have not yet been served with the Parish of Cameron's Original Petition for damages. Accordingly, this Notice of Removal is timely filed in accordance with 28 U.S.C. § 1446(b) and Rule 6 of the Federal Rules of Civil Procedure.

Consent. Consents are unnecessary because no Defendants have been served. 28 U.S.C. § 1446(b)(2).

Service. Undersigned counsel certifies that, promptly after the filing of this Notice of Removal, copies of the Notice will be served on opposing counsel and filed with the Clerk of Court of the 38th Judicial District Court for the Parish of Cameron, State of Louisiana, to effect the removal of the state court action. 28 U.S.C. § 1446(d).

Grounds for Removal. This case is removable because (1) the Parish's claims are subject to maritime jurisdiction and (2) the Parish's claims are subject to OCSLA jurisdiction.

GROUND FOR REMOVAL

I. The Parish's claims are subject to maritime jurisdiction.

"A federal court's authority to hear cases in admiralty flows initially from the Constitution, which 'extend[s]' federal judicial power 'to all Cases of admiralty and maritime Jurisdiction.'" U.S. Const., Art. III, § 2; *see also Jerome B. Grubart, Inc. v. Great Lakes Dredge & Dock Co.*, 513 U.S. 527, 531 (1995). "Congress has embodied that power in a statute giving federal district courts 'original jurisdiction [over] . . . [a]ny civil case of admiralty or maritime jurisdiction . . .'" 28 U.S.C. § 1333(1).

Here, many of the injuries alleged by the Parish have allegedly occurred and continue to occur on navigable waters. For example, the Parish asserts that Defendants' allegedly unlawful conduct stems in large part from "the dredging of numerous canals in, through, and across the Operational Area." Pet. ¶ 25. Because these canals are part of a network of navigable waterways

through the lands at issue, this case implicates traditional maritime activities and belongs in federal court. Moreover, whereas in prior coastal lawsuits Jefferson and Plaquemines Parishes expressly disclaimed maritime claims, Cameron Parish's Petition includes no such disclaimer. *See id.* ¶ 33.

Defendants recognize that the legal basis of this removal ground is unsettled: there is a well-defined split in authority regarding whether Congress's recent amendments to 28 U.S.C. § 1441 allow general maritime cases to be removed to federal court. Some courts have found that § 1441 does not allow general maritime cases to be removed. *See, e.g., Parish of Plaquemines v. Total Petrochemical & Refining USA, Inc.*, 64 F. Supp. 3d 872, 898–900 (E.D. La. 2014); *Plaquemines Parish v. Rozel Operating Co.*, 2015 WL 403791, at *4 (E.D. La. 2015). Other courts in this Circuit, however, have taken the opposite view that Congress's recent amendments to 28 U.S.C. § 1441 *do allow* general maritime cases to be removed to federal court. *See, e.g., Carrigan v. M/V AMC Ambassador*, 2014 WL 358353 (S.D. Tex. Jan. 31, 2014); *Bridges v. Phillips 66 Co.*, 2013 WL 6092803 (M.D. La. Nov. 19, 2013) (adopting report and recommendations). Likewise, the only federal appellate court to address the issue held that § 1441 allows general maritime cases to be removed. *Lu Junhong v. Boeing Co.*, 792 F.3d 805 (7th Cir. 2015).² And notably, the removability of general maritime claims currently is before the Fifth Circuit in *Board of Commissioners of the Southeast Louisiana Flood Protection Authority—East, et al v. Tennessee Gas Pipeline Company, LLC, et al*, No. 15-30162 (5th Cir.). This split in authority reflects disagreement among respected jurists on an important question of federal law. Therefore, removal is appropriate and, ultimately, appellate guidance is necessary. *See Riverside Const.*, 626 Fed. App'x at 445 (removal of maritime claims is “objectively

² Although *Lu Junhong* did not address the effect of the “saving-to-suitors” clause of 28 U.S.C. § 1333, the Fifth Circuit has found that that the “saving-to-suitors” clause does not guarantee a state-court forum. *See Tenn. Gas Pipeline v. Hous. Cas. Ins. Co.*, 87 F.3d 150, 153 (5th Cir. 1996).

reasonable” because removability of maritime claims is a “hotly contested and unresolved” issue).

II. The Parish’s claims are subject to federal OCSLA jurisdiction.

Removal is proper under 43 U.S.C. § 1349(b)(1) and 28 U.S.C. § 1441(a) because this action arises “in connection with” oil and gas operations conducted on the outer continental shelf. OCSLA provides that “the subsoil and seabed of the outer Continental Shelf appertain to the United States and are subject to its jurisdiction, control, and power of disposition.” 43 U.S.C. § 1332(1). In turn, OCSLA provides for exclusive federal question jurisdiction over the outer continental shelf by extending “[t]he Constitution and laws and civil and political jurisdiction of the United States . . . [to the Outer Continental Shelf] and all installations and other devices permanently or temporarily attached to the seabed . . . for the purpose of exploring for, developing, or producing resources therefrom.” 43 U.S.C. § 1333(a)(1). A plaintiff need not expressly invoke OCSLA for it to provide a basis for federal jurisdiction. *Amoco Prod. Co. v. Sea Robin Pipeline Co.*, 844 F.2d 1202, 1205 (5th Cir. 1988).

Here, the Parish’s Petition alleges broadly that Defendants operated “drilling and production sites” — including “numerous oil and gas wells,” canals, and pipelines — in violation of Louisiana’s coastal zone management laws. *See, e.g.*, Pet. ¶¶ 17, 19–25. The challenged activities involve components of the dense, highly integrated, and interconnected infrastructure relating to the outer continental shelf. The Parish’s allegations and the relief sought thus “aris[e] out of” and “in connection with” operations conducted on the outer continental shelf, and as such, 43 U.S.C. § 1349(b)(1) grants original jurisdiction in federal court over this action. *See In re Deepwater Horizon*, 745 F.3d 157, 163 (5th Cir. 2014) (citing *EP Operating Ltd. P’ship v.*

Placid Oil Co., 26 F.3d 563, 568-69 (5th Cir. 1994)); *Barker v. Hercules Offshore Inc.*, 713 F.3d 208 (5th Cir. 2013).

Defendants recognize that courts in the Eastern District of Louisiana have previously rejected an argument similar to this one. *See, e.g., Total Petrochemical*, 64 F. Supp. 3d 872 at 893–98. But given the potentially severe effect of this litigation on Defendants’ outer continental shelf operations, the important question of whether federal jurisdiction attaches to claims involving pipelines that transport minerals from the outer continental shelf, and the fact-intensive nature of the inquiry, Defendants respectfully submit that removal is proper under OCSLA in this case.

CONCLUSION

Defendants respectfully remove to this Court case number 10-19582 from the 38th District Court of Cameron Parish, Louisiana.

Dated: April 21, 2016

Respectfully submitted,

/s/ Kelly B. Becker

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Attorneys for Exxon Mobil Corporation

CERTIFICATE OF SERVICE

I hereby certify that on April 21, 2016, a copy of the above and foregoing Notice of Removal was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record by electronic mail and/or regular mail.

/s/ Kelly B. Becker

CYNTHIA P. KING
CAMERON PARISH CLERK OF COURT
P O BOX 549
CAMERON, LA. 70631
TELEPHONE: 337/775-5316 FAX: 337/775-7172

RECEIPT OF CIVIL FAXED FILINGS

The Parish of Cameron : 38TH Judicial District Court

Vs No: 10-19582 : Parish of Cameron

Austin Oil & Gas Inc et al : State of Louisiana

Dear Council,

I hereby acknowledge receipt of your notice of filing notice of
Removal ; notice of Removal

for filing on this 22nd day of April, 2016. Within 7

days, exclusive of legal holidays, you must forward to the following:

- (1) The original signed document.
- (2) Filing fee of \$ 151.00 of which will include a \$5.00 transmission fee and fax charges.
- (3) SUIT HAS ENOUGH MONEY TO COVER COST

Please send a check for the total charges due.

DEBBIE SAVOIE
Deputy Clerk of Court

*This does not include charge for
Exhibits that were not filed.
Charge for Exhibits are \$2.00 per
page.*

504-556-4108

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Fax Transmittal

To: HON. CYNTHIA P. KING, Clerk
Company: 38th JDC, Cameron Parish
Fax No.: 337-775-7172
Contact No.: 337-775-5136

Total No. of Pages: 17
Date/Time Sent: April 21, 2016
Client/Matter No.: 99900.0007

From: Kelly B. Becker, Esq.
Direct No.: 504-556-4067
E-mail: rbmcneal@liskow.com

Comments: **PLEASE SEE THE ATTACHED.**

The information contained in this facsimile message is legally privileged and confidential, intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you received this communication in error, please notify us immediately by telephone, and return the original message to us at the above address via the U.S. Postal Service.

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April 21, 2016

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VIA FAX and U.S. Mail

Cynthia P. King
Clerk of Court
38th Judicial District Court
Parish of Cameron
119 Smith Circle
Room 21
Cameron, Louisiana 70631-0549

Re: *The Parish of Cameron v. Auster Oil and Gas, Inc., et al.*
38th Judicial District Court, Parish of Cameron
Docket No. 10-19582

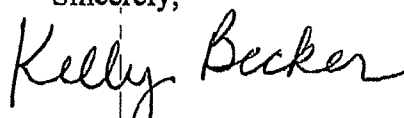
Dear Ms. King:

Enclosed please find a Notice to State Court of Removal filed in the above-captioned matter.

Pursuant to La. R.S. 13:850, we are filing the enclosed by facsimile transmission. Also required by La. R.S. 13:850, we are delivering to you, by U.S. Mail, the original and one copy of the enclosed pleading. We understand that your office will fax to us an invoice for filing costs due. Upon receipt of your invoice, we will forward our firm check to you with the pleading. Please file the pleading in the record and return a date-stamped copy in the enclosed self addressed, stamped envelope to my attention.

Thank you for your assistance and courtesies. If you have any questions, please give me a call.

Sincerely,



Kelly B. Becker

KBB/kge
Enclosure

4432028_1

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2016 APR 22 AM 8 33

38TH JUDICIAL DISTRICT COURT FOR THE PARISH OF CAMERON
CLERK OF COURT
CAMERON PARISH, LA.

STATE OF LOUISIANA

CIVIL NO. 10-19582

DIVISION "A"

THE PARISH OF CAMERON

VERSUS

AUSTER OIL AND GAS, INC., ET AL.

FILED: _____

DEPUTY CLERK

NOTICE OF FILING NOTICE OF REMOVAL

PLEASE TAKE NOTICE that on April 21, 2016, Defendants, Shell Offshore, Inc., Shell Oil Company, SWEPI LP, BP America Production Company, Chevron Pipe Line Company, Chevron U.S.A. Holdings Inc., Chevron U.S.A., Inc., The Texas Company, and Exxon Mobil Corporation ("Defendants") filed in the office of the Clerk of the United States District Court for the Western District of Louisiana, a Notice of Removal of the above action to said United States District Court.

A copy of such Notice of Removal is annexed hereto.

Respectfully submitted,

/s/ Kelly B. Becker

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Attorneys for Exxon Mobil Corporation

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the above and foregoing pleading has been served upon all counsel of record by electronic mail, fax, and/or depositing same in the United States mail, postage prepaid and properly addressed, this 21st day of April, 2016.

/s/ Kelly B. Becker

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
(LAKE CHARLES DIVISION)

THE PARISH OF CAMERON,
Plaintiff

v.

AUSTER OIL AND GAS, INC., APACHE OIL CORPORATION, BP AMERICA PRODUCTION COMPANY, CHEVRON PIPE LINE COMPANY, CHEVRON U.S.A. HOLDINGS, INC., CHEVRON U.S.A., INC., DARSEY OPERATING CORPORATION, ENERVEST OPERATING, L.L.C., EXXON MOBIL CORPORATION, FREEPORT SULPHUR COMPANY, GULFPORT ENERGY CORPORATION, HILCORP ENERGY COMPANY, HONEYWELL INTERNATIONAL, INC., KERR-MCGEE OIL AND GAS ONSHORE LP, RESOURCE SECURITIES CORPORATION, SAMUEL GARY JR. & ASSOCIATES, INC., SHELL OFFSHORE, INC., SHELL OIL COMPANY, STAR ENERGY, INC., SWEPI LP, TAYLOR ENERGY COMPANY, LLC, TEXAS PACIFIC OIL COMPANY, INC., TEXAS PETROLEUM INVESTMENT COMPANY, THE TEXAS COMPANY, TRANSCONTINENTAL OIL CORPORATION AND VERNON E. FAULCONER, INC.
Defendants.

Civil Action No. _____
Section: _____
Judge: Hon. _____
Mag. Judge: Hon. _____

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2016 APR 22 AM 8 33
CLERK OF COURT
CAMERON PARISH, LA.

DEFENDANTS' NOTICE OF REMOVAL

On February 4, 2016, the Parish of Cameron filed its Original Petition for Damages in the 38th Judicial District Court for the Parish of Cameron (the "Petition") against Defendants Shell Offshore, Inc., Shell Oil Company, SWEPI LP, BP America Production Company, Chevron Pipe Line Company, Chevron U.S.A. Holdings Inc., Chevron U.S.A., Inc., The Texas Company, and Exxon Mobil Corporation ("Defendants"). Without waiving any of their jurisdictional and other defenses, Defendants respectfully remove this civil action from the 38th Judicial District Court if the Parish of Cameron to the United States District Court for the Western District of Louisiana.

INTRODUCTION

Counsel for the Parish has now filed 39 near-identical lawsuits in 3 coastal parishes. Private landowners have filed 4 follow-on petitions. The Attorney General of Louisiana and the Secretary of the Louisiana Department of Natural Resources have since intervened in all of the parish cases. These lawsuits ask state trial judges to preside over what the Parish views as a referendum on a century of prosperous oil and gas activities in Louisiana's coastal zone.¹ Neither the parishes nor the state entities see any role for the federal government in this process.

But the Parish cannot avoid the fact that Defendants' oil and gas activities are a critical component of the nation's energy security and intersect with federal issues across multiple dimensions. For example, the challenged activities include the dredging and maintenance of navigable waterways and transportation of minerals to and from the outer continental shelf. It is beyond dispute that, if successful, the Louisiana coastal cases could have a seismic effect on

¹ See, e.g., *Board of Comm'rs of the Se. La. Flood Protection Auth. v. Tennessee Gas Pipeline Co., LLC*, 2:13-cv-05410, at *80-81 (E.D. La. June 27, 2014) (order denying remand) ("While Plaintiff may not be expressly challenging a specific action of a federal agency, the breadth of Plaintiff's claims amounts to a collateral attack on an entire regulatory scheme.... Plaintiff's claims are premised on the notion that this regulatory framework provides inadequate protection for the residents of southeastern Louisiana, and through this litigation, Plaintiff seeks to have the entire oil and gas industry compensate residents for the shortfall.").

federal energy policy and regulation of Louisiana's coastal zone. This Court has removal jurisdiction under general maritime law and the Outer Continental Shelf Lands Act ("OCSLA").

It bears noting, however, that the federal jurisdictional questions in this case are shrouded in uncertainty. Previously, the Eastern District of Louisiana remanded the 28 cases that the Parishes' counsel brought in Jefferson and Plaquemines Parishes. Key jurisdictional questions at issue in those cases — including the removability of general maritime and OCS pipeline claims — remain "hotly contested." *See, e.g., Riverside Const. Co. v. Entergy Miss., Inc.*, 626 Fed. App'x 443, 445 (5th Cir. 2015), *as revised* (Oct. 16, 2015). Until the Fifth Circuit clarifies the jurisdictional impact of general maritime claims and OCSLA, uncertainty will cause further protracted battles over removal and remand. This Court should consider ending the uncertainty by asserting jurisdiction and certifying an appeal to the Fifth Circuit under 28 U.S.C. § 1292(b).

REMOVAL PREREQUISITES

Under 28 U.S.C. § 1441(a), "any civil action brought in a State court of which the district courts have original jurisdiction, may be removed by the defendant or defendants, to the district court of the United States for the district and division embracing the place where such action is pending." Because this case satisfies all prerequisites of removal, it belongs in federal court.

Venue. This notice of removal is properly directed to this Court pursuant to § 1441 because this Court is "the district court of the United States for the district and division" within which the State Court Petition is pending. *See* 28 U.S.C. § 98(a).

State Court Record. Pursuant to 28 U.S.C. § 1446(a), Defendants attach as Exhibit 1 a copy of all process, pleadings, and orders in this action and available in the state court record.

Notice of Removal is Timely. Defendants have not yet been served with the Parish of Cameron's Original Petition for damages. Accordingly, this Notice of Removal is timely filed in accordance with 28 U.S.C. § 1446(b) and Rule 6 of the Federal Rules of Civil Procedure.

Consent. Consents are unnecessary because no Defendants have been served. 28 U.S.C. § 1446(b)(2).

Service. Undersigned counsel certifies that, promptly after the filing of this Notice of Removal, copies of the Notice will be served on opposing counsel and filed with the Clerk of Court of the 38th Judicial District Court for the Parish of Cameron, State of Louisiana, to effect the removal of the state court action. 28 U.S.C. § 1446(d).

Grounds for Removal. This case is removable because (1) the Parish's claims are subject to maritime jurisdiction and (2) the Parish's claims are subject to OCSLA jurisdiction.

GROUND FOR REMOVAL

I. The Parish's claims are subject to maritime jurisdiction.

"A federal court's authority to hear cases in admiralty flows initially from the Constitution, which 'extend[s]' federal judicial power 'to all Cases of admiralty and maritime Jurisdiction.'" U.S. Const., Art. III, § 2; *see also Jerome B. Grubart, Inc. v. Great Lakes Dredge & Dock Co.*, 513 U.S. 527, 531 (1995). "Congress has embodied that power in a statute giving federal district courts 'original jurisdiction [over] . . . [a]ny civil case of admiralty or maritime jurisdiction . . .'" 28 U.S.C. § 1333(1).

Here, many of the injuries alleged by the Parish have allegedly occurred and continue to occur on navigable waters. For example, the Parish asserts that Defendants' allegedly unlawful conduct stems in large part from "the dredging of numerous canals in, through, and across the Operational Area." Pet. ¶ 25. Because these canals are part of a network of navigable waterways

through the lands at issue, this case implicates traditional maritime activities and belongs in federal court. Moreover, whereas in prior coastal lawsuits Jefferson and Plaquemines Parishes expressly disclaimed maritime claims, Cameron Parish's Petition includes no such disclaimer. *See id.* ¶ 33.

Defendants recognize that the legal basis of this removal ground is unsettled: there is a well-defined split in authority regarding whether Congress's recent amendments to 28 U.S.C. § 1441 allow general maritime cases to be removed to federal court. Some courts have found that § 1441 does not allow general maritime cases to be removed. *See, e.g., Parish of Plaquemines v. Total Petrochemical & Refining USA, Inc.*, 64 F. Supp. 3d 872, 898–900 (E.D. La. 2014); *Plaquemines Parish v. Rozel Operating Co.*, 2015 WL 403791, at *4 (E.D. La. 2015). Other courts in this Circuit, however, have taken the opposite view that Congress's recent amendments to 28 U.S.C. § 1441 *do allow* general maritime cases to be removed to federal court. *See, e.g., Carrigan v. M/V AMC Ambassador*, 2014 WL 358353 (S.D. Tex. Jan. 31, 2014); *Bridges v. Phillips 66 Co.*, 2013 WL 6092803 (M.D. La. Nov. 19, 2013) (adopting report and recommendations). Likewise, the only federal appellate court to address the issue held that § 1441 allows general maritime cases to be removed. *Lu Junhong v. Boeing Co.*, 792 F.3d 805 (7th Cir. 2015).² And notably, the removability of general maritime claims currently is before the Fifth Circuit in *Board of Commissioners of the Southeast Louisiana Flood Protection Authority—East, et al v. Tennessee Gas Pipeline Company, LLC, et al*, No. 15-30162 (5th Cir.). This split in authority reflects disagreement among respected jurists on an important question of federal law. Therefore, removal is appropriate and, ultimately, appellate guidance is necessary. *See Riverside Const.*, 626 Fed. App'x at 445 (removal of maritime claims is "objectively

² Although *Lu Junhong* did not address the effect of the "saving-to-suitors" clause of 28 U.S.C. § 1333, the Fifth Circuit has found that that the "saving-to-suitors" clause does not guarantee a state-court forum. *See Tenn. Gas Pipeline v. Hous. Cas. Ins. Co.*, 87 F.3d 150, 153 (5th Cir. 1996).

reasonable” because removability of maritime claims is a “hotly contested and unresolved” issue).

II. The Parish’s claims are subject to federal OCSLA jurisdiction.

Removal is proper under 43 U.S.C. § 1349(b)(1) and 28 U.S.C. § 1441(a) because this action arises “in connection with” oil and gas operations conducted on the outer continental shelf. OCSLA provides that “the subsoil and seabed of the outer Continental Shelf appertain to the United States and are subject to its jurisdiction, control, and power of disposition.” 43 U.S.C. § 1332(1). In turn, OCSLA provides for exclusive federal question jurisdiction over the outer continental shelf by extending “[t]he Constitution and laws and civil and political jurisdiction of the United States . . . [to the Outer Continental Shelf] and all installations and other devices permanently or temporarily attached to the seabed . . . for the purpose of exploring for, developing, or producing resources therefrom.” 43 U.S.C. § 1333(a)(1). A plaintiff need not expressly invoke OCSLA for it to provide a basis for federal jurisdiction. *Amoco Prod. Co. v. Sea Robin Pipeline Co.*, 844 F.2d 1202, 1205 (5th Cir. 1988).

Here, the Parish’s Petition alleges broadly that Defendants operated “drilling and production sites” — including “numerous oil and gas wells,” canals, and pipelines — in violation of Louisiana’s coastal zone management laws. *See, e.g.*, Pet. ¶¶ 17, 19–25. The challenged activities involve components of the dense, highly integrated, and interconnected infrastructure relating to the outer continental shelf. The Parish’s allegations and the relief sought thus “aris[e] out of” and “in connection with” operations conducted on the outer continental shelf, and as such, 43 U.S.C. § 1349(b)(1) grants original jurisdiction in federal court over this action. *See In re Deepwater Horizon*, 745 F.3d 157, 163 (5th Cir. 2014) (citing *EP Operating Ltd. P’ship v.*

Placid Oil Co., 26 F.3d 563, 568-69 (5th Cir. 1994)); *Barker v. Hercules Offshore Inc.*, 713 F.3d 208 (5th Cir. 2013).

Defendants recognize that courts in the Eastern District of Louisiana have previously rejected an argument similar to this one. *See, e.g., Total Petrochemical*, 64 F. Supp. 3d 872 at 893–98. But given the potentially severe effect of this litigation on Defendants’ outer continental shelf operations, the important question of whether federal jurisdiction attaches to claims involving pipelines that transport minerals from the outer continental shelf, and the fact-intensive nature of the inquiry, Defendants respectfully submit that removal is proper under OCSLA in this case.

CONCLUSION

Defendants respectfully remove to this Court case number 10-19582 from the 38th District Court of Cameron Parish, Louisiana.

Dated: April 21, 2016

Respectfully submitted,

/s/ Kelly B. Becker

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Attorneys for Exxon Mobil Corporation

CERTIFICATE OF SERVICE

I hereby certify that on April 21, 2016, a copy of the above and foregoing Notice of Removal was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record by electronic mail and/or regular mail.

/s/ Kelly B. Becker

MEMORY TRANSMISSION REPORT

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FAX NO.1 : 337-775-7172
NAME : Cameron Clerk Court

FILE NO. : 287
DATE : 04.22 08:36
TO : 15045564108-3400
DOCUMENT PAGES : 3
START TIME : 04.22 08:37
END TIME : 04.22 08:39
PAGES SENT : 3
STATUS : OK

SUCCESSFUL TX NOTICE

CYNTHIA P. KING
CAMERON PARISH CLERK OF COURT
P O BOX 549
CAMERON, LA. 70631
TELEPHONE: 337/775-5316 FAX: 337/775-7172

RECEIPT OF CIVIL FAXED FILINGS

The Parish of Cameron : 38TH Judicial District Court
Vs No: 10-19582 : Parish of Cameron
Austin Die : Gas Inc et al : State of Louisiana

Dear Council

I hereby acknowledge receipt of your Notice of filing notice of Removal ; notice of Removal
for filing on this 22nd day of April, 2016. Within 7 days, exclusive of legal holidays, you must forward to the following:

- (1) The original signed document.
- (2) Filing fee of \$151.00 of which will include a \$5.00 transmission fee and fax charges.
- (3) SUIT HAS ENOUGH MONEY TO COVER COST

Please send a check for the total charges due.

DEBBIE SAVOIE
Deputy Clerk of Court

This does not include charge for Exhibits that were not paid. Charge for Exhibits are \$2.00 per page.
504-556-4108



600 JEFFERSON STREET, SUITE 1600
POST OFFICE BOX 3408
LAFAYETTE, LOUISIANA 70502-3408
337-593-7600
FAX 337-593-7601
www.joneswalker.com

Carmen M. Rodriguez
Direct Dial 337-262-7622
Direct Fax 337-262-9001
carmenrodriguez@joneswalker.com

15894300

June 8, 2016

Clerk, 38th JDC, Cameron Parish
P.O. Box 549
Cameron, LA 70631

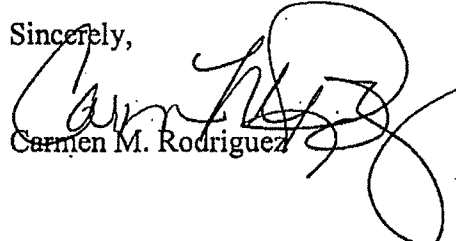
Re: The Parish of Cameron v.
Auster Oil and Gas, Inc., et al
Docket No.: 10-19582

Dear Clerk:

Enclosed are the original and one copy of Apache Corporation's Supplemental Notice of Removal, filed this date in the United States District Court for the Western District of Louisiana. Please file the original into the record and return a file-stamped copy to me in the enclosed self-addressed stamped envelope. My firm's check in the amount of \$33.00 is enclosed to cover the costs of filing.

Please call if you have any questions.

Sincerely,


Carmen M. Rodriguez

CMR:kg
Enclosures

{L0394553.1}

JONES WALKER LLP.

ALABAMA • ARIZONA • CALIFORNIA • DISTRICT OF COLUMBIA • FLORIDA • GEORGIA • LOUISIANA • MISSISSIPPI • NEW YORK • OHIO • TEXAS

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION

THE PARISH OF CAMERON, ET AL

VERSUS

AUSTER OIL AND GAS, INC., ET AL

CIVIL ACTION NO. 16-5

JUDGE MINALDI

MAGISTRATE JUDGE KAT

CLERK OF COURT
CAMERON PARISH, LA.

2016 JUN 13 AM 11 20

RECEIVED & FILED

SUPPLEMENTAL NOTICE OF REMOVAL

Defendant Apache Corporation ("Apache"), erroneously named in the Petition as Apache Oil Corporation, and with a full reservation of rights, supplements as follows the bases for removal regarding the civil action filed in the 38th Judicial District Court for the Parish of Cameron, State of Louisiana, entitled *The Parish of Cameron v. Auster Oil and Gas, Inc., et al*, Docket No. 10-19582. A copy of the Petition previously has been filed into the record of this matter as an attachment to the Notice of Removal filed by Shell Offshore, Inc., Shell Oil Company, SWEPI LP, BP America Production Company, Chevron Pipe Line Company, Chevron U.S.A. Holdings, Inc., Chevron U.S.A., Inc., The Texas Company, and Exxon Mobil Corporation. *See* Rec. Doc. 1-2.

1. **Venue.** This Court is a proper venue because the Parish of Cameron filed the Petition on February 4, 2016 in the 38th Judicial District Court for the Parish of Cameron, State of Louisiana, Civil Action No. 10-19582. The 38th Judicial District Court is located within the geographic confines of the Lake Charles Division of the Western District of Louisiana.

2. **State Court Record.** Pursuant to 28 U.S.C. § 1446(a), Apache incorporates by reference the documents filed at Rec. Doc. 1-2, which is an attachment to the original Notice of

Removal. Rec. Doc. 1-2 consists of a true and correct copy of all process, pleadings, and orders contained in the state court record at the time of the original removal. Rec. Doc. 1-2 is incorporated as an attachment to this Supplemental Notice of Removal. Apache has confirmed, through the Clerk of Court for the 38th Judicial District Court for Cameron Parish, Louisiana, that nothing further has been filed into the state court public record since the filing of the original Notice of Removal.

3. *Notice of Removal is Timely.* Apache was served with a copy of the Petition on May 9, 2016. Accordingly, this Supplemental Notice of Removal is being filed within thirty days after the receipt by Apache, through service or otherwise, of a copy of the Petition and is therefore timely filed in accordance with 28 U.S.C. § 1446(b) and Rule 6 of the Federal Rules of Civil Procedure.

4. *Consent.* The record before this Court shows that, at the time this matter was removed, all Defendants that had been named in this action and that the court record showed had been served, consent to the removal.

5. *Notice of Removal.* Pursuant to 28 U.S.C. § 1446(d), undersigned counsel certifies that, promptly after the filing of this Supplemental Notice of Removal, copies of the Notice will be served on opposing counsel and filed with the Clerk of Court of the 38th Judicial District Court for the Parish of Cameron, State of Louisiana, as provided by law, to document an additional jurisdictional basis for the removal of the state court action.

GROUND FOR REMOVAL

6. *Jurisdictional Bases.* Apache adopts as if fully set forth herein the bases for removal identified in Defendants' Notice of Removal filed April 21, 2016. In addition to the grounds identified in that Notice, this case is independently removable under 28 U.S.C. §

1441(b) because it is “founded on a claim or right arising under the Constitution, treaties or laws of the United States.” *See also* 28 U.S.C. § 1331.

7. ***Applicable Law.*** It is well established that federal question jurisdiction exists where the plaintiff’s claim, though pled under state law, “necessarily raise[s] a stated federal issue, actually disputed and substantial, which a federal forum may entertain without disturbing any congressionally approved balance of federal and state judicial responsibilities.” Grable & Sons Metal Prods. Inc. v. Darue Eng’r & Mfg., 545 U.S. 308, 314 (2005); *see also* Franchise Tax Bd. v. Construction Laborers Vacation Trust, 463 U.S. 1, 13 (1983) (“Even though state law creates appellant’s causes of action, its case might still ‘arise under’ the laws of the United States if a well-pleaded complaint established that its right to relief under state law requires resolution of a substantial question of federal law in dispute between the parties.”). The Fifth Circuit, applying these tenets, has held that where the *remedy* sought by the plaintiff cannot be granted without the application of federal law, the complaint may raise a federal question, despite the plaintiff’s effort to proceed exclusively under state law. *See* Medina v. Ramsey Steel Co., 238 F.3d 674, 680 (5th Cir. 2001); *see also* Gillis v. Louisiana, 294 F.3d 755, 760 (5th Cir. 2002) (concluding that plaintiff was “implicitly” proceeding under federal law in part based on relief sought).

8. ***Plaintiff’s Allegations.*** Plaintiff’s complaint necessarily raises questions of federal law. Plaintiff alleges that Defendants’ oil and gas activities have resulted in the “dredging of numerous canals in, through, and across the Operational Area.” Complaint, at p. 14, ¶ 25. Defendants allegedly failed to design, construct, and maintain the canals using the best practical techniques. *Id.* Allegedly as a consequence, Defendants’ dredging activities resulted in the “degradation” of the Operational Area and increased the risk of storm-generated surges and

other flooding damage. *Id.* Plaintiff seeks, among other things, the revegetation, refilling, cleaning, detoxification, and “actual restoration” of the alleged affected areas. Complaint, at p. 14, ¶ 25, Prayer for Relief(c). That remedy necessarily entails reference to and the application and interpretation of federal law, which pervasively regulates coastal restoration through an intricate web of statutes and rules, as the Plaintiff acknowledges. *See* Compl. at pp. 6-11, ¶¶ 4-18. Apache in no way concedes that the Plaintiff is entitled to the remedies it seeks; to the contrary, it will contest vigorously every aspect of the Plaintiff’s claims, including whether the court possesses authority to grant the Parish the relief it seeks, whether the Parish is entitled to such relief, and whether the relief requested is appropriate under the applicable federal legal and regulatory standards.

9. ***The Plaintiff’s Demand Necessarily Implicates Federal Law.*** The property at issue in this lawsuit is subject to an extensive array of federal laws that implicate complex questions of federal policy in areas as diverse as coastal restoration, environmental protection, energy policy, national security, navigation, and interstate commerce, to name but a few. Indeed, numerous federal statutes and regulations expressly recognize the strong federal policy interests in those areas. For example, the Coastal Zone Management Act recognizes that “[t]here is a national interest in the effective management, beneficial use, protection, and development of the coastal zone.” 16 U.S.C. § 1451(a). And Congress has declared that it is a “*national policy* . . . ‘(a) to preserve, protect, develop, and where possible, to restore or enhance, the resources of the Nation’s coastal zone for this and succeeding generations’” *U.S. v. Holland*, 373 F. Supp. 665, 674, n.14 (M.D. Fla. 1974) (emphasis added) (citing 16 U.S.C. § 1452). Reflecting in part this national policy, for example, the Rivers and Harbors Act requires that an applicant obtain the approval of the Army Corps of Engineers before any navigable canal may be dredged, filled, or

altered, and makes it unlawful “to *excavate or fill, or in any manner to alter or modify* the course, location, condition, or capacity of, any, canal, lake, harbor or refuge . . . or of the channel of any navigable water of the United States, unless the work has been” permitted by the Army Corps. 33 U.S.C. § 403 (emphasis added). Because the plaintiff’s complaint necessarily raises complex and interrelated issues involving many areas addressed by federal statutes and regulations, this case is one in which there is “a serious federal interest in claiming the advantages thought to be inherent in a federal forum.” Grable, 545 U.S. at 313-314.

10. ***Federal/State Comity.*** Exercising federal jurisdiction in this case does not disturb the congressionally-approved balance of federal and state judicial responsibilities. To the contrary, there is a clear interest in making a federal forum available here. Grable, 545 U.S. at 319. Addressing and resolving the competing interests of navigation, interstate commerce, energy resource development, and coastal zone management is an exercise long conducted at the federal level, and not a field that historically has been regulated primarily by the states. *Cf. Gunn v. Minton*, 133 S. Ct. 1059, 1066 (2013) (noting that states have a traditional role in regulating lawyers, and thus transferring legal malpractice cases from state to federal court would threaten to upset the federal-state balance). Indeed, the Parish’s complaint is the rare case that, although attempting to plead only state causes of action, raises substantial and serious federal questions in an area of unique federal concern. Recognizing jurisdiction here, therefore, does not noticeably affect the “federal-state division of labor.” Grable, 545 U.S. at 315. In sum, “there is no good reason to shirk from federal jurisdiction over the dispositive and contested federal issue[s] at the heart of” the Parish’s complaint. *See Id.* at 319-320.

Apache requests that the discontinuance of further proceedings in the 38th Judicial District Court for the Parish of Cameron, State of Louisiana, triggered by the original Notice of

Removal in this matter, be extended by this Supplemental Notice of Removal and that this action be recognized as removed to and pending on the docket of the United States District Court for the Western District of Louisiana on the jurisdictional grounds described in this Supplemental Notice of Removal, as the law in such cases provides.

Respectfully submitted:

JONES WALKER LLP

/s/ Carmen M. Rodriguez
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Telephone: (337) 262-9000
Facsimile: (337) 262-9001

and

BOYD A. BRYAN (#18145)
Jones Walker LLP
8555 United Plaza Boulevard
Baton Rouge, Louisiana 70809-7000
Direct Dial: (225) 248-2134
Direct Fax: (225) 248-3134

ATTORNEYS FOR APACHE CORPORATION

CERTIFICATE OF SERVICE

I hereby certify that on June 8, 2016, a copy of the foregoing document was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel by operation of the court's electronic filing system.

/s/ Carmen M. Rodriguez

TALBOT, CARMOUCHE & MARCELLO

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VICTOR L. MARCELLO
JOHN H. CARMOUCHE

*Member of the Texas Bar

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WILLIAM R. COENEN, III
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TODD J. WIMBERLEY
ROSS J. DONNES
D. ADELE OWEN
LEAH C. POOLE
CHRISTOPHER D. MARTIN

AUBERT D. TALBOT
(1925-2005)

May 11, 2018

Honorable Susan Racca
Cameron Parish Clerk of Court
119 Smith Circle Room 21
Post Office Box 549
Cameron, LA 70631-0549

Re: Cameron Parish v. Auster Oil & Gas, Inc., et al.
Docket No. 10-19582 (Hackberry)
38th JDC; Parish of Cameron; State of Louisiana

Dear Ms. Racca:

Please effect service of the Original Petition for Damages in the referenced manner as follows:

1. **AUSTER OIL AND GAS, INC.**
Through its registered agent for service of process:
John A. Hogan
2036 Olene Drive
Sulphur, LA 70663
2. **DARSEY OPERATING CORPORATION**
Through its registered agent for service of process:
William G. Darsey, III or Robert K. Irwin
120 Rue Beauregard, Suite 100
Lafayette, LA 70505
3. **RESOURCE SECURITIES CORPORATION**
Through its registered agent for service of process:
Wayne Hyman
124 Oak Coullee Drive
Lafayette, LA 70507
4. **STAR ENERGY, INC.**
Through its registered agent for service of process:
W. Miguel Swanwick
121 River Drive
Lafayette, LA 70503

RECEIVED & FILED
2018 MAY 11 P 12:19
CLERK OF COURT
CAMERON PARISH, LA

Susan Racca
Page 2
May 11, 2018

Also enclosed is a check which represents the filing and service fees.

With kindest regards, I am

Very truly yours,

A handwritten signature in black ink that reads "John H. Carmouche/sls". The signature is written in a cursive, flowing style.

John H. Carmouche

JHC/sls
Enclosures
cc: All counsel of record via e-mail only

CITATION

STATE OF LOUISIANA

TO: RESOURCE SECURTIES CORPORATION, THROUGH ITS REGISTERED AGENT FOR
SERVICE OF PROCESS: WAYNE HYMAN, 124 OAK COULLEE DRIVE,
LAFAYETTE, LA 70507

You are hereby cited to appear before said Court, for said Parish, and to comply with the demand contained in the petition of DAMAGES against you, a certified copy of which petition accompanied this citation, or file your answers thereto in writing in the office of the Clerk of Court, in the City of Cameron, in said Parish, within Thirty (30) days after the service hereof, under penalty of default.

Witness the Honorable PENELOPE RICHARD, Judge of said court, this 11TH day of

MAY, A.D. 2018.

Issued and delivered MAY 11, A.D. 2018.

Reina Warner
Deputy Clerk of Court

REQUESTED BY: JOHN CARMOUCHE P1

*****STATE COST EXEMPT*****

SHERIFF'S RETURN - PERSONAL OR DOMICILIARY

FEE \$_____ SERVED:_____ PERSONAL _____ DOMICILIARY _____

MILEAGES _____ SERVED TO: _____

TOTAL \$ _____ REMARKS: _____

DATE SERVED: _____ DEPUTY SIGNATURE & BADGE NUMBER _____

CITATION

THE PARISH OF CAMERON
VS NO. 10-19582
AUSTER OIL & GAS INC ET AL

38TH JUDICIAL DISTRICT COURT
PARISH OF CAMERON
STATE OF LOUISIANA

TO: AUSTER OIL & GAS INC, THROUGH ITS REGISTERED AGENT FOR
SERVICE OF PROCESS: JOHN A HOGAN, 2036 OLENE DRIVE, SULPHUR, LA 70663

You are hereby cited to appear before said Court, for said Parish, and to comply with the demand contained in the petition of DAMAGES against you, a certified copy of which petition accompanied this citation, or file your answers thereto in writing in the office of the Clerk of Court, in the City of Cameron, in said Parish, within Thirty (30) days after the service hereof, under penalty of default.

Witness the Honorable PENELOPE RICHARD, Judge of said court, this 11TH day of MAY, A.D. 2018.

Issued and delivered MAY 11, A.D. 2018

Recia Warner
Deputy Clerk of Court

REQUESTED BY: JOHN CARMOUCHE P1

*****STATE COST EXEMPT*****

SHERIFF'S RETURN - PERSONAL OR DOMICILIARY

FEE \$ SERVED: PERSONAL DOMICILIARY

 MILEAGES SERVED TO:

TOTAL \$ REMARKS:

DATE SERVED:
DEPUTY SIGNATURE & BADGE NUMBER

CITATION

THE PARISH OF CAMERON
VS NO. 10-19582
AUSTER OIL & GAS INC ET AL

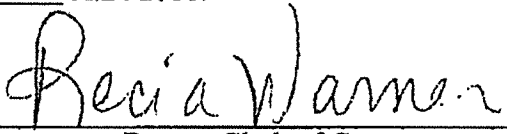
38TH JUDICIAL DISTRICT COURT
PARISH OF CAMERON
STATE OF LOUISIANA

TO: STAR ENERGY INC, THROUGH ITS REGISTERED AGENT FOR
SERVICE OF PROCESS: W MIGUEL SWANWICK, 121 RIVER DRIVE,
LAFAYETTE, LA 70503

You are hereby cited to appear before said Court, for said Parish, and to comply with the demand contained in the petition of DAMAGES against you, a certified copy of which petition accompanied this citation, or file your answers thereto in writing in the office of the Clerk of Court, in the City of Cameron, in said Parish, within Thirty (30) days after the service hereof, under penalty of default.

Witness the Honorable PENELOPE RICHARD, Judge of said court, this 11TH day of MAY, A.D. 2018.

Issued and delivered MAY 11, A.D. 2018.


Deputy Clerk of Court

REQUESTED BY: JOHN CARMOUCHE P1

***** STATE COST EXEMPT *****

SHERIFF'S RETURN - PERSONAL OR DOMICILIARY

FEE \$ SERVED: PERSONAL DOMICILIARY
 MILEAGES SERVED TO:

TOTAL \$ REMARKS:

DATE SERVED:
DEPUTY SIGNATURE & BADGE NUMBER

CITATION

THE PARISH OF CAMERON
VS NO. 10-19582
AUSTER OIL & GAS INC ET AL

38TH JUDICIAL DISTRICT COURT
PARISH OF CAMERON
STATE OF LOUISIANA

TO: DARSEY OPERATING CORPORATION, THROUGH ITS REGISTERED AGENT FOR
SERVICE OF PROCESS: WILLIAM G DARSEY III OR ROBERT K IRWIN,
120 RUE BEAUREGARD STE 100, LAFAYETTE, LA 70505

You are hereby cited to appear before said Court, for said Parish, and to comply with the demand contained in the petition of DAMAGES against you, a certified copy of which petition accompanied this citation, or file your answers thereto in writing in the office of the Clerk of Court, in the City of Cameron, in said Parish, within Thirty (30) days after the service hereof, under penalty of default.

Witness the Honorable PENELOPE RICHARD, Judge of said court, this 11TH day of MAY, A.D. 2018.

Issued and delivered MAY 11, A.D. 2018.

Bevia Warner
Deputy Clerk of Court

REQUESTED BY: JOHN CARMOUCHE P1

STATE COST EXEMPT

SHERIFF'S RETURN - PERSONAL OR DOMICILIARY

FEE \$ SERVED: PERSONAL DOMICILIARY
 MILEAGES SERVED TO:

TOTAL \$ REMARKS:

DATE SERVED: DEPUTY SIGNATURE & BADGE NUMBER

38TH JUDICIAL DISTRICT COURT FOR THE PARISH OF CAMERON

STATE OF LOUISIANA

DOCKET NO. 10-19582

RECEIVED & FILED
2018 MAY 11 P 12:19
CLERK OF COURT
PARISH OF CAMERON, LA.

THE PARISH OF CAMERON

VERSUS

AUSTER OIL AND GAS, INC., APACHE OIL CORPORATION, BP AMERICA PRODUCTION COMPANY, CHEVRON PIPE LINE COMPANY, CHEVRON U.S.A. HOLDINGS, INC., CHEVRON U.S.A., INC., DARSEY OPERATING CORPORATION, ENERVEST OPERATING, L.L.C., EXXON MOBIL CORPORATION, FREEPORT SULPHUR COMPANY, GULFPORT ENERGY CORPORATION, HILCORP ENERGY COMPANY, HONEYWELL INTERNATIONAL, INC., KERR-MCGEE OIL AND GAS ONSHORE LP, RESOURCE SECURITIES CORPORATION, SAMUEL GARY JR. & ASSOCIATES, INC., SHELL OFFSHORE, INC., SHELL OIL COMPANY, STAR ENERGY, INC., SWEPI LP, TAYLOR ENERGY COMPANY LLC, TEXAS PACIFIC OIL COMPANY, INC., TEXAS PETROLEUM INVESTMENT COMPANY, THE TEXAS COMPANY, TRANSCONTINENTAL OIL CORPORATION AND VERNON E. FAULCONER, INC.

FILED: _____

DEPUTY CLERK OF COURT

REQUEST FOR NOTICE OF TRIAL, NOTICE OF JUDGMENT, AND NOTICE OF REPRESENTATION

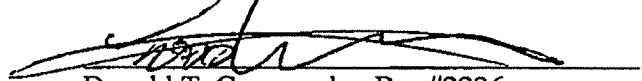
TO: CLERK OF COURT
PARISH OF CAMERON

Please be advised that undersigned counsel will represent plaintiff, The Parish of Cameron, and to hereby request that written notice be mailed to undersigned counsel by the Clerk, by certified mail, properly stamped and addressed, at least ten (10) days before the date fixed for the trial on the merits hereof, or any hearing on any other matter herein, all in accordance with La. C. C. P. art. 1572.

It is further requested that the undersigned be sent notice of the rendition and signing of all final judgments and interlocutory orders or judgments pursuant to La. C. C. P. articles 1913 and 1914.

By Attorneys:

TALBOT, CARMOUCHE & MARCELLO
17405 Perkins Road
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Telephone: (225) 400-9991
Fax: (225) 448-2568



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Attorneys for Plaintiffs

38TH JUDICIAL DISTRICT COURT FOR THE PARISH OF CAMERON

STATE OF LOUISIANA

DOCKET NO. 10-19582

THE PARISH OF CAMERON

VERSUS

AUSTER OIL AND GAS, INC., APACHE OIL CORPORATION, BP AMERICA PRODUCTION COMPANY, CHEVRON PIPE LINE COMPANY, CHEVRON U.S.A. HOLDINGS, INC., CHEVRON U.S.A., INC., DARSEY OPERATING CORPORATION, ENERVEST OPERATING, L.L.C., EXXON MOBIL CORPORATION, FREEPORT SULPHUR COMPANY, GULFPORT ENERGY CORPORATION, HILCORP ENERGY COMPANY, HONEYWELL INTERNATIONAL, INC., KERR-MCGEE OIL AND GAS ONSHORE LP, RESOURCE SECURITIES CORPORATION, SAMUEL GARY JR. & ASSOCIATES, INC., SHELL OFFSHORE, INC., SHELL OIL COMPANY, STAR ENERGY, INC., SWEPI LP, TAYLOR ENERGY COMPANY LLC, TEXAS PACIFIC OIL COMPANY, INC., TEXAS PETROLEUM INVESTMENT COMPANY, THE TEXAS COMPANY, TRANSCONTINENTAL OIL CORPORATION AND VERNON E. FAULCONER, INC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the above and forgoing pleading has been forwarded to the following counsel of record by electronic mail and/or by placing same in the United States mail, postage prepaid, and properly addressed.

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Chevron U.S.A. Holdings, Inc., Chevron
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and
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Office of Governor John Bel Edwards
Governor's Office for Coastal Activities
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Thomas F. Harris*

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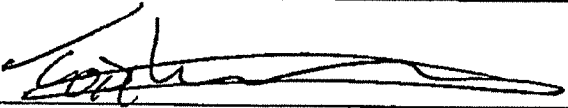
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Baton Rouge, Louisiana this 11th day of May, 2018.



Todd J. Wimberley

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
OFFICE OF THE CLERK

May 9, 2018

Susan Racca, Clerk of Court
38th Judicial District Court
Cameron Parish
P O Box 549
Cameron, LA 70631

RECEIVED & FILED
2018 MAY 14 A 10:22
CLERK OF COURT
CAMERON PARISH, LA.

In re: Civil Action No. 2:16-cv-00530-TAD-KK
CAMERON V. AUSTER OIL & GAS INC ET AL
Your Case No. 10-19582

Dear Clerk:

Please be advised that the above captioned matter has been remanded to your Court. We enclose herewith a certified copy of our docket sheet and the Judgment or Order to Remand.

The official court record for the Western District of Louisiana is the electronic case filing system, CM/ECF. Our website is: <http://ecf.lawd.uscourts.gov>; counsel may access this database to obtain any pleadings you require.

Please acknowledge receipt on the enclosed copy of this letter.

ATTORNEYS ARE ADVISED THAT ALL FUTURE FILINGS SHOULD BE DIRECTED TO THE RECEIVING COURT NAMED ABOVE.

For questions regarding this document or transmission, please call our CM/ECF help desk at 1-866-323-1101.

THUS DONE May 9, 2018.

TONY R. MOORE
CLERK OF COURT

A Crawford
DEPUTY CLERK OF COURT

ATTENTION

**U.S. District Court
Western District of Louisiana (Lake Charles)
CIVIL DOCKET FOR CASE #: 2:16-cv-00530-TAD-KK**

Cameron v. Auster Oil & Gas Inc et al
Assigned to: Judge Terry A Doughty
Referred to: Magistrate Judge Kathleen Kay
Demand: \$0

Date Filed: 04/21/2016
Jury Demand: Both
Nature of Suit: 890 Other Statutory
Actions
Jurisdiction: Federal Question

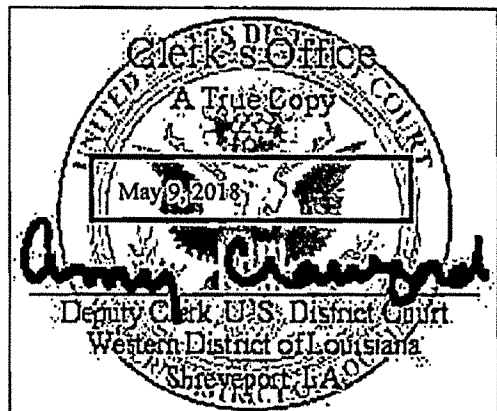
Related Cases: 2:16-cv-00531-TAD-KK
2:16-cv-00532-TAD-KK
2:16-cv-00535-TAD-KK
2:16-cv-00536-TAD-KK
2:16-cv-00537-TAD-KK
2:16-cv-00538-TAD-KK
2:16-cv-00539-TAD-KK
2:16-cv-00540-TAD-KK
2:16-cv-00541-TAD-KK
2:16-cv-00542-TAD-KK

Case in other court: 38th JDC (Cameron), 10-19582
Cause: 43:1331 General Maritime/OCSLA

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TERMINATED: 05/17/2016

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Defendant

Shell Oil Co

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Defendant

Swepi L P

represented by **Kelly Brechtel Becker**
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Dana M Douglas
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ATTORNEY TO BE NOTICED

Mark L McNamara
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Russell Keith Jarrett
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Defendant

Star Energy Inc

Defendant

Taylor Energy Co L L C

represented by **Guy Earl Wall**

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ATTORNEY TO BE NOTICED

Defendant

Texas Pacific Oil Co Inc

Defendant

Texas Petroleum Investment Co

represented by **Valerie Vige Guidry**

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Defendant

Texas Co

represented by **Claire Elizabeth Juneau**
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Louis V Gregoire , Jr
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Michael R Phillips
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ATTORNEY TO BE NOTICED

Pamela R Mascari
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ATTORNEY TO BE NOTICED

Defendant

Transcontinental Oil Corp

Defendant

Vernon E Faulconer Inc

represented by **Alex L Andrus , III**
Guglielmo Lopez et al
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Defendant

Apache Corp
incorrectly named as Apache Oil Corp

represented by **Douglas C Longman , Jr**
Jones Walker (LAF)
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ATTORNEY TO BE NOTICED

| Date Filed | # | Docket Text |
|------------|----------|---|
| 04/21/2016 | <u>1</u> | NOTICE of Removal from 38th JDC Cameron Parish, Case Number 10-19582 with Jury Demand; (Filing fee \$400, receipt number 0536-3052719) filed by Chevron U S A Inc, Shell Offshore Inc, Chevron USA Holdings Inc, The Texas Co, Swepi L P, BP America Production Co, Shell Oil Co, Exxon Mobil Corp, Chevron Pipe Line Co. (Attachments: # <u>1</u> Civil cover sheet, # <u>2</u> Exhibit Ex 1 - State Court Record) (aty,Becker, Kelly) (Attachment 1 replaced on 4/22/2016) (Thigpen, M). (Entered: 04/21/2016), (QC'ed on 04/22/2016, by Thigpen , M) |
| 04/21/2016 | | INTERVENOR COMPLAINT filed by State of Louisiana. ADMINISTRATIVE ENTRY: (THE PDF IMAGE CAN BE FOUND IN ATTACHMENT #2 OF DOCUMENT <u>1</u> NOTICE OF REMOVAL).(crt,Thigpen, M) (Entered: 04/22/2016), (QC'ed on 04/22/2016, by Thigpen , M) |
| 04/21/2016 | | CASE Assigned to Judge Patricia Minaldi and Magistrate Judge Kathleen Kay. (crt,Thigpen, M) (Entered: 04/22/2016) |
| 04/21/2016 | | INTERVENOR COMPLAINT filed in Case #10-19582, 38th JDC, Cameron Parish, on 4/13/2016 by State of Louisiana obo LA Dept of Natural Resources. ADMINISTRATIVE ENTRY as pleading filed within pdf of attachment #2 to <u>1</u> Notice of Removal (crt,Putch, A). Modified on 4/25/2016 to edit filer (Putch, A). (Entered: 04/25/2016), (QC'ed on 04/28/2016, by Thigpen , M) |
| 04/22/2016 | <u>2</u> | NOTICE of Corporate Disclosure Statement Requirement re: <u>1</u> Notice of Removal,, sent to Joe B Norman, Alexandra Giselle White, Robert B McNeal, Michael P Cash, Jamie D Rhymes, Martin A Stern, Glen M Pilie', Jeffrey E Richardson, David M Stein, Roy C Cheatwood, Monica A Frois, George Arceneaux, III, Matthew A Woolf, Tyler L Weidlich, Kelly Brechtel Becker, Russell Keith Jarrett, Mark L McNamara, Dana M Douglas, Brittan Jackson Bush, Claire Elizabeth Juneau, Charles S McCowan, III, Louis V Gregoire, Jr, Pamela R Mascari, Michael R Phillips, Eric J Mayer on behalf of BP America Production Co, Chevron Pipe Line Co, Chevron U S A Inc, Chevron USA Holdings Inc, Exxon Mobil Corp, Shell Offshore Inc, Shell Oil Co, Swepi L P. Corporate Disclosure Statement due by 5/6/2016. (crt,Thigpen, M) (Entered: 04/22/2016) |
| 04/22/2016 | <u>3</u> | PROPOSED ORDER referred to Magistrate Judge Kay. (Public entry, but no electronic notice). (crt,Thigpen, M) (Entered: 04/22/2016) |
| 04/25/2016 | <u>4</u> | REMOVAL ORDER forwarded to all counsel of record. Signed by Magistrate Judge Kathleen Kay on 04/25/2016. (crt,LaCombe, L) (Entered: 04/25/2016) |
| 04/28/2016 | <u>5</u> | CORPORATE DISCLOSURE STATEMENT by B P America Production Co identifying Corporate Parent B P P L C for B P America Production Co. (aty,Norman, Joe) Modified on 4/28/2016 to correct corporate parent name (Whidden, C). (Entered: 04/28/2016), (QC'ed on 04/28/2016, by Whidden , C) |
| 04/28/2016 | <u>6</u> | Ex Parte MOTION for Leave to Serve Summons and Complaint with consent by Parish of Cameron. Motions referred to Kathleen Kay. (Attachments: # <u>1</u> Certificate |

of No Opposition, # 2 Proposed order)(aty,Marcello, Victor) Modified text on 4/29/2016 (YocumSld, M). (Entered: 04/28/2016), (QC'ed on 04/29/2016, by YocumSld , M)

- 04/28/2016 7 CORPORATE DISCLOSURE STATEMENT by Chevron Pipe Line Co, Chevron U S A Holdings Inc, Chevron U S A Inc, Texas Co identifying Corporate Parent Chevron Corp for Chevron Pipe Line Co, Chevron U S A Holdings Inc, Chevron U S A Inc, Texas Co. (aty,Juneau, Claire) (Entered: 04/28/2016), (QC'ed on 04/29/2016, by YocumSld , M)
- 04/29/2016 8 RESPONSE TO REMOVAL ORDER by B P America Production Co, Chevron Pipe Line Co, Chevron U S A Holdings Inc, Chevron U S A Inc, Exxon Mobil Corp, Shell Offshore Inc, Shell Oil Co, Swepi L P, Texas Co . (Attachments: # 1 Exhibit A - Docs in State Court Record)(aty,Becker, Kelly) (Entered: 04/29/2016), (QC'ed on 04/29/2016, by YocumSld , M)
- 04/29/2016 9 CORPORATE DISCLOSURE STATEMENT by Shell Oil Co identifying Corporate Parent Royal Dutch Shell P L C for Shell Oil Co. (aty,Becker, Kelly) (Entered: 04/29/2016), (QC'ed on 04/29/2016, by YocumSld , M)
- 04/29/2016 10 CORPORATE DISCLOSURE STATEMENT by Shell Offshore Inc identifying Corporate Parent Shell Oil Co, Corporate Parent Shell U S E & P Investments L L C, Corporate Parent S O I Finance Inc, and Corporate Parent Royal Dutch Shell P L C for Shell Offshore Inc. (aty,Becker, Kelly) Modified text to include all corporate parent names on 4/29/2016 (YocumSld, M). (Entered: 04/29/2016), (QC'ed on 04/29/2016, by YocumSld , M)
- 04/29/2016 11 CORPORATE DISCLOSURE STATEMENT by Swepi L P identifying Corporate Parent Shell Oil Co, Corporate Parent Shell Energy Holding G P L L C, Corporate Parent Shell U S E & P Investments L L C for Swepi L P. (aty,Becker, Kelly) (Entered: 04/29/2016), (QC'ed on 04/29/2016, by YocumSld , M)
- 05/03/2016 12 ELECTRONIC ORDER re 6 Motion for Leave to File Summons and Complaint. No leave of court is required for plaintiff to affect service and no action by plaintiff could serve as a waiver of any objection to subject matter jurisdiction as the defense is not waivable and cannot be conferred by consent. Accordingly the motion is DENIED. Signed by Magistrate Judge Kathleen Kay on 5/3/2016. (jud,Kay, Kathleen) (Entered: 05/03/2016), (QC'ed on 05/04/2016, by LaCombe , L)
- 05/03/2016 REQUEST FOR ISSUANCE OF SUMMONS as to All Defendants, requested by Parish of Cameron. (aty,Marcello, Victor) (Entered: 05/03/2016), (QC'ed on 05/04/2016, by YocumSld , M)
- 05/03/2016 13 CORPORATE DISCLOSURE STATEMENT by Exxon Mobil Corp. (aty,McNeal, Robert) (Entered: 05/03/2016), (QC'ed on 05/04/2016, by YocumSld , M)
- 05/04/2016 14 SUMMONS ISSUED as to Apache Oil Corp, Auster Oil & Gas Inc, B P America Production Co, Chevron Pipe Line Co, Chevron U S A Holdings Inc, Chevron U S A Inc, Darsey Operating Corp, Enervest Operating L L C, Exxon Mobil Corp, Freeport Sulphur Co, Gulfport Energy Corp, Hilcorp Energy Co, Honeywell International Inc, Kerr-McGee Oil & Gas Onshore L P, Resource Securities Corp,

Samuel Gary Jr & Associates Inc, Shell Offshore Inc, Shell Oil Co, Star Energy Inc, Swepi L P, Taylor Energy Co L L C, Texas Co, Texas Pacific Oil Co Inc, Texas Petroleum Investment Co, Transcontinental Oil Corp, Vernon E Faulconer Inc (crt,YocumSld, M) (Entered: 05/04/2016)

- 05/10/2016 15 Joint MOTION FOR EXTENSION of Filing Deadlines and to Delay Rule 26 Requirements Pending Ruling on Remand Motion with consent by Parish of Cameron, B P America Production Co, Chevron Pipe Line Co, Chevron U S A Holdings Inc, Chevron U S A Inc, Exxon Mobil Corp, State of Louisiana, State of Louisiana(Ex Rel Jeff Landry), Shell Offshore Inc, Shell Oil Co, Swepi L P, Texas Co. Motions referred to Kathleen Kay. (Attachments: # 1 Exhibit Certificate of No Opposition, # 2 Proposed order)(aty,Becker, Kelly) Modified text and to add filer on 5/11/2016 (Dunford, T). (Entered: 05/10/2016), (QC'ed on 05/11/2016, by Bunting , M)
- 05/11/2016 16 ELECTRONIC ORDER re 15 Motion for Extension. The motion is denied without prejudice to the rights of movers to refile when and if a Motion to Remand is actually filed. Signed by Magistrate Judge Kathleen Kay on 5/11/2016. (jud,Kay, Kathleen) (Entered: 05/11/2016), (QC'ed on 05/12/2016, by LaCombe , L)
- 05/11/2016 17 CORPORATE DISCLOSURE STATEMENT by Freeport Sulphur Co identifying Corporate Parent Freeport McMoran Inc for Freeport Sulphur Co. (aty,Hainkel, Alida) (Entered: 05/11/2016), (QC'ed on 05/11/2016, by Bunting , M)
- 05/11/2016 18 MOTION to Remand by Parish of Cameron. Motions referred to Kathleen Kay. (Attachments: # 1 Memorandum in Support of Motion to Remand, # 2 Proposed order)(aty,Marcello, Victor) (Entered: 05/11/2016), (QC'ed on 05/12/2016, by Bunting , M)
- 05/12/2016 19 NOTICE of Motion Setting regarding 18 MOTION to Remand. Motions referred to Kathleen Kay. (crt,Bunting, M) (Entered: 05/12/2016)
- 05/12/2016 20 Joint MOTION FOR EXTENSION of Filing Deadlines and Delay Rule 26 Requirements Pending Ruling on Remand Motion with consent by Parish of Cameron, B P America Production Co, Chevron Pipe Line Co, Chevron U S A Holdings Inc, Chevron U S A Inc, Exxon Mobil Corp, State of Louisiana, State of Louisiana(Ex Rel Jeff Landry), Shell Offshore Inc, Shell Oil Co, Swepi L P, Texas Co. Motions referred to Kathleen Kay. (Attachments: # 1 Exhibit Certificate of No Opposition, # 2 Proposed order)(aty,Becker, Kelly) Modified text and added filer on 5/13/2016 (YocumSld, M). (Entered: 05/12/2016), (QC'ed on 05/13/2016, by YocumSld , M)
- 05/16/2016 21 ELECTRONIC ORDER granting 20 Motion for Extension. IT IS ORDERED that, until ordered to do so by the Court after a final ruling on Plaintiffs motion to remand, no defendant shall be required to file responsive pleadings, the Federal Rule of Civil Procedure 26(f) conference in this proceeding shall be delayed, and the obligations of the parties under Federal Rule of Civil Procedure 26 shall be delayed. Signed by Magistrate Judge Kathleen Kay on 5/16/2016. (jud,Kay, Kathleen) Modified on 5/16/2016 to edit text (LaCombe, L). (Entered: 05/16/2016), (QC'ed on 05/16/2016, by LaCombe , L)

- 05/16/2016 22 MOTION for Extension of Time to File Response/Reply as to 18 MOTION to Remand with consent by B P America Production Co, Chevron Pipe Line Co, Chevron U S A Holdings Inc, Chevron U S A Inc, Exxon Mobil Corp, Shell Offshore Inc, Shell Oil Co, Swepi L P, Texas Co. Motions referred to Kathleen Kay. (Attachments: # 1 Exhibit Certificate of No Opposition, # 2 Proposed order) (aty,Becker, Kelly) (Entered: 05/16/2016), (QC'ed on 05/16/2016, by Putsch , A)
- 05/17/2016 23 CORPORATE DISCLOSURE STATEMENT by Apache Corp. (aty,Longman, Douglas) (Entered: 05/17/2016), (QC'ed on 05/17/2016, by Reasor , M)
- 05/17/2016 24 ELECTRONIC ORDER granting 22 Motion for Extension of Time to File Response/Reply re 18 MOTION to Remand. Responses due by 6/8/2016. Signed by Magistrate Judge Kathleen Kay on 5/17/2016. (jud,Kay, Kathleen) (Entered: 05/17/2016), (QC'ed on 05/18/2016, by LaCombe , L)
- 05/18/2016 25 CORPORATE DISCLOSURE STATEMENT by Hilcorp Energy Co identifying Corporate Parent Hilcorp Energy Co for Hilcorp Energy Co. (aty,Isenberg, Craig) (Entered: 05/18/2016), (QC'ed on 05/18/2016, by Putsch , A)
- 05/18/2016 26 CORPORATE DISCLOSURE STATEMENT by Enervest Operating L L C identifying Corporate Parent EnerVest, Ltd for Enervest Operating L L C. (aty,Zuckerman, Adam) (Entered: 05/18/2016), (QC'ed on 05/19/2016, by Putsch , A)
- 05/23/2016 27 MOTION to Remand by State of Louisiana, State of Louisiana(Ex Rel Jeff Landry). Motions referred to Kathleen Kay. (Attachments: # 1 Memorandum / Brief, # 2 Proposed order)(aty,Jones, Steven) Modified on 5/24/2016 to edit text (Putsch, A). (Entered: 05/23/2016), (QC'ed on 05/24/2016, by Putsch , A)
- 05/23/2016 28 FILED IN ERROR CORPORATE DISCLOSURE STATEMENT by Texas Petroleum Investment Co. (aty,Guidry, Valerie) Modified on 5/23/2016 to indicate filed in error after received call from attorneys office re: wrong pdf (FinnSld, P). (Entered: 05/23/2016), (QC'ed on 05/23/2016, by FinnSld , P)
- 05/23/2016 29 CORPORATE DISCLOSURE STATEMENT by Texas Petroleum Investment Co. (aty,Guidry, Valerie) (Entered: 05/23/2016), (QC'ed on 05/24/2016, by Putsch , A)
- 05/24/2016 30 NOTICE of Motion Setting regarding 27 MOTION to Remand . Motions referred to Kathleen Kay. (crt,Putsch, A) (Entered: 05/24/2016)
- 05/24/2016 31 CORPORATE DISCLOSURE STATEMENT by Vernon E Faulconer Inc. (aty,Andrus, Alex) (Entered: 05/24/2016), (QC'ed on 05/26/2016, by Putsch , A)
- 05/27/2016 32 CORPORATE DISCLOSURE STATEMENT by Taylor Energy Co L L C. (aty,Cook, Jonathan) (Entered: 05/27/2016), (QC'ed on 05/27/2016, by Putsch , A)
- 06/08/2016 33 SUPPLEMENTAL NOTICE OF REMOVAL by Apache Corp (aty,Rodriguez, Carmen) Modified on 6/8/2016 to modify docket text (Whidden, C). Modified to modify docket text on 7/5/2016 (Thomas, T). (Entered: 06/08/2016), (QC'ed on 06/08/2016, by Whidden , C)

- 06/08/2016 34 MEMORANDUM in Opposition re 27 MOTION to Remand *of the State of Louisiana* filed by B P America Production Co, Chevron Pipe Line Co, Chevron U S A Holdings Inc, Chevron U S A Inc, Exxon Mobil Corp, Shell Offshore Inc, Shell Oil Co, Swepi L P, Texas Co. (aty,Becker, Kelly) (Entered: 06/08/2016), (QC'ed on 06/08/2016, by Whidden , C)
- 06/08/2016 35 MOTION to Request Oral Argument re 18 MOTION to Remand , 27 MOTION to Remand by B P America Production Co, Chevron Pipe Line Co, Chevron U S A Holdings Inc, Chevron U S A Inc, Exxon Mobil Corp, Shell Offshore Inc, Shell Oil Co, Swepi L P, Texas Co. Motions referred to Kathleen Kay. (Attachments: # 1 Proposed order)(aty,Becker, Kelly) Modified on 6/8/2016 to modify motion and docket text (Whidden, C). (Entered: 06/08/2016), (QC'ed on 06/08/2016, by Whidden , C)
- 06/08/2016 36 MEMORANDUM in Opposition re 27 MOTION to Remand *by State of Louisiana* filed by Enervest Operating L L C. (aty,Degan, Nancy) (Entered: 06/08/2016), (QC'ed on 06/08/2016, by Whidden , C)
- 06/08/2016 37 CORPORATE DISCLOSURE STATEMENT by Honeywell International Inc. (aty,Kostal, Tyler) (Entered: 06/08/2016), (QC'ed on 06/08/2016, by Whidden , C)
- 06/08/2016 38 MEMORANDUM in Opposition re 18 MOTION to Remand filed by B P America Production Co, Chevron Pipe Line Co, Chevron U S A Holdings Inc, Chevron U S A Inc, Exxon Mobil Corp, Shell Offshore Inc, Shell Oil Co, Swepi L P, Texas Co. (Attachments: # 1 Affidavit Declaration of Larry Lovas, # 2 Exhibit 1, # 3 Exhibit 2, # 4 Exhibit 3)(aty,Juneau, Claire) (Entered: 06/08/2016), (QC'ed on 06/08/2016, by Whidden , C)
- 06/08/2016 39 AFFIDAVIT OF BENJAMIN SCHLESINGER, Ph.D. re 38 Memorandum in Opposition to 18 Motion to Remand by B P America Production Co, Chevron Pipe Line Co, Chevron U S A Holdings Inc, Chevron U S A Inc, Exxon Mobil Corp, Shell Offshore Inc, Shell Oil Co, Swepi L P, Texas Co. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D, # 5 Exhibit E)(aty,Juneau, Claire) Modified on 6/8/2016 to modify docket text and to create docket entry relationship (Whidden, C). (Entered: 06/08/2016), (QC'ed on 06/08/2016, by Whidden , C)
- 06/08/2016 40 NOTICE TO THE COURT AND JOINDER IN MEMORANDUM in Opposition re 18 MOTION to Remand , 27 MOTION to Remand filed by Apache Corp. (aty,Rodriguez, Carmen) Modified on 6/9/2016 to modify docket text (Whidden, C). (Entered: 06/08/2016), (QC'ed on 06/09/2016, by Whidden , C)
- 06/10/2016 41 MEMORANDUM in Opposition re 18 MOTION to Remand *by The Parish of Cameron* filed by Enervest Operating L L C. (aty,Degan, Nancy) (Entered: 06/10/2016), (QC'ed on 06/10/2016, by Whidden , C)
- 06/10/2016 42 ELECTRONIC ORDER granting 35 Motion for Hearing Motion day set for 9/1/2016 at 01:30 PM in Lake Charles, Courtroom 3 before Magistrate Judge Kathleen Kay.. Signed by Magistrate Judge Kathleen Kay on 6/10/2016. (jud,Kay, Kathleen) (Entered: 06/10/2016), (QC'ed on 06/15/2016, by LaCombe , L)

- 06/10/2016 43 MOTION for Matthew T. Heartney to Appear Pro Hac Vice (Admission fee: \$105, receipt number 0536-3095563) by B P America Production Co. Motions referred to Kathleen Kay. (Attachments: # 1 Exhibit A Heartney Cert of good Standing, # 2 Proposed order)(aty,Norman, Joe) (Entered: 06/10/2016), (QC'ed on 06/13/2016, by Crick , S)
- 06/10/2016 44 MOTION for Nancy G. Milburn to Appear Pro Hac Vice (Admission fee: \$105, receipt number 0536-3095576) by B P America Production Co. Motions referred to Kathleen Kay. (Attachments: # 1 Exhibit A Milburn Cert of good Standing, # 2 Proposed order)(aty,Norman, Joe) Modified on 6/13/2016 to modify docket text (Crick, S). (Entered: 06/10/2016), (QC'ed on 06/13/2016, by Crick , S)
- 06/13/2016 45 ORDER granting 43 Motion to Appear Pro Hac Vice for appearance of Matthew T Heartney for B P America Production Co. Signed by Magistrate Judge Kathleen Kay on 06/13/16. (crt,Crick, S) (Entered: 06/14/2016), (QC'ed on 06/15/2016, by Whidden , C)
- 06/13/2016 46 ORDER granting 44 Motion to Appear Pro Hac Vice for appearance of Nancy G Milburn for B P America Production Co. Signed by Magistrate Judge Kathleen Kay on 06/13/16. (crt,Crick, S) (Entered: 06/14/2016), (QC'ed on 06/15/2016, by Whidden , C)
- 06/16/2016 47 REPLY to Response to Motion re 18 MOTION to Remand filed by Parish of Cameron. (Attachments: # 1 Exhibit A - Gagliano Affidavit, # 2 Exhibit B - Templet Affidavit, # 3 Exhibit C - Norman Affidavit)(aty,Marcello, Victor) (Entered: 06/16/2016), (QC'ed on 06/20/2016, by Dauterive , C)
- 06/20/2016 48 REPLY to Response to Motion re 27 MOTION to Remand filed by State of Louisiana, State of Louisiana(Ex Rel Jeff Landry). (aty,Seidemann, Ryan) (Entered: 06/20/2016), (QC'ed on 06/20/2016, by Dauterive , C)
- 06/28/2016 49 NOTICE of Appearance by George H Robinson, Jr on behalf of Samuel Gary Jr & Associates Inc (Attorney George H Robinson, Jr added to party Samuel Gary Jr & Associates Inc(pty:dft)) (aty,Robinson, George) (Entered: 06/28/2016), (QC'ed on 06/29/2016, by Whidden , C)
- 06/29/2016 50 NOTICE of Corporate Disclosure Statement Requirement re: 49 Notice of Appearance, sent to George H Robinson, Jr on behalf of Samuel Gary Jr & Associates Inc. Corporate Disclosure Statement due by 7/13/2016. (crt,Whidden, C) (Entered: 06/29/2016)
- 07/01/2016 51 CORPORATE DISCLOSURE STATEMENT by Samuel Gary Jr & Associates Inc identifying Corporate Parent Gary Energy Corporation. (aty,Robinson, George) Modified to remove duplicate text on 7/1/2016 (Thomas, T). (Entered: 07/01/2016), (QC'ed on 07/01/2016, by Thomas , T)
- 07/01/2016 52 MOTION to Remand *Regarding Supplemental Removal Notice Filed by Apache Corporation Alleging Substantial Federal Question Jurisdiction* by Parish of Cameron. Motions referred to Kathleen Kay. (Attachments: # 1 Proposed order, # 2 Memorandum in Support, # 3 Exhibit A - Affidavit of Claude Fike, # 4 Exhibit B - Part 1 of 2 - Environmental Impact Statement, # 5 Exhibit B - Part 2 of 2 -

- Environmental Impact Statement)(aty,Marcello, Victor) (Entered: 07/01/2016), (QC'ed on 07/01/2016, by Thomas , T)
- 07/01/2016 53 NOTICE of Motion Setting regarding 52 MOTION to Remand *Regarding Supplemental Removal Notice Filed by Apache Corporation Alleging Substantial Federal Question Jurisdiction*. Motions referred to Kathleen Kay. (crt,Thomas, T) (Entered: 07/01/2016)
- 07/01/2016 54 MOTION to Remand regarding 33 Supplemental Notice of Removal by State of Louisiana, State of Louisiana(Ex Rel Jeff Landry). Motions referred to Kathleen Kay. (Attachments: # 1 Proposed order)(aty,Jones, Steven) Modified to reflect motion adopts document 52 , edit docket text and add document linkage on 7/5/2016 (Thomas, T). (Entered: 07/01/2016), (QC'ed on 07/05/2016, by Thomas , T)
- 07/05/2016 55 NOTICE of Motion Setting regarding 54 MOTION to Remand . Motions referred to Kathleen Kay. (crt,Thomas, T) (Entered: 07/05/2016)
- 07/25/2016 56 Opposition to 54 MOTION to Remand, 52 MOTION to Remand Regarding Supplemental Removal Notice Filed by Apache Corporation Alleging Substantial Federal Question Jurisdiction filed by Apache Corp. (aty,Rodriguez, Carmen) Modified on 7/26/2016 to modify docket text (Crick, S). (Entered: 07/25/2016), (QC'ed on 07/26/2016, by Crick , S)
- 08/04/2016 57 REPLY to Opposition Memorandum to 52 MOTION to Remand Regarding Supplemental Removal Notice Filed by Apache Corporation Alleging Substantial Federal Question Jurisdiction, 54 MOTION to Remand filed by Parish of Cameron. (Attachments: # 1 Exhibit A - Supplemental Notice of Removal, # 2 Exhibit B - Affidavit of Claude Fike)(aty,Marcello, Victor) Modified on 8/5/2016 to modify docket text (Crick, S). (Entered: 08/04/2016), (QC'ed on 08/05/2016, by Crick , S)
- 08/04/2016 58 REPLY MEMORANDUM IN SUPPORT of 54 MOTION to Remand adopting 57 Reply to Opposition Memorandum filed by State of Louisiana, State of Louisiana(Ex Rel Jeff Landry). (aty,Jones, Steven) Modified on 8/5/2016 to modify docket text (Crick, S). (Entered: 08/04/2016), (QC'ed on 08/05/2016, by Crick , S)
- 08/25/2016 59 MOTION for Ashley C Parrish to Appear Pro Hac Vice (Admission fee: \$105, receipt number 0536-3159218) by Chevron Pipe Line Co, Chevron U S A Holdings Inc, Chevron U S A Inc, and Texas Co. Motions referred to Kathleen Kay. (Attachments: # 1 Certificate of good standing, # 2 Proposed order)(aty,Mascari, Pamela) Modified on 8/25/2016 to modify motion and docket text, and to add filer (Whidden, C). (Entered: 08/25/2016), (QC'ed on 08/25/2016, by Whidden , C)
- 08/25/2016 ELECTRONIC ORDER: Given the pendency of Board of Commrs of the Southeast La. Flood Prot. Auth-East v. Tennessee Gas Pipeline Co., LLC, 29 F.Supp 3d 808 (E.D. La. 2014) before the U.S. Fifth Circuit Court of Appeals and its applicability to this proceeding, the hearing scheduled for September 1, 2016 at 1:30 p.m. is TERMINATED. Once the court of appeals has ruled we will allow the parties the opportunity to supplement or amend their memoranda, should they find supplementation or amendment warranted, and will proceed accordingly at that time.. Signed by Magistrate Judge Kathleen Kay on 8/25/2016. (crt,Solari, E)

(Entered: 08/25/2016), (QC'ed on 08/26/2016, by LaCombe , L)

- 08/30/2016 60 ORDER granting 59 Motion to Appear Pro Hac Vice for appearance of Ashley C Parrish for Chevron Pipe Line Co, Ashley C Parrish for Chevron U S A Holdings Inc, Ashley C Parrish for Chevron U S A Inc, Ashley C Parrish for Texas Co. Signed by Magistrate Judge Kathleen Kay on 08/30/2016. (crt,Crick, S) (Entered: 08/30/2016)
- 09/14/2016 61 MOTION for Donald W. Price to Enroll as Counsel by State of Louisiana. Motions referred to Kathleen Kay. (Attachments: # 1 Proposed order)(aty,Terrell, Megan) (Entered: 09/14/2016), (QC'ed on 09/15/2016, by Crick , S)
- 09/21/2016 62 ORDER granting 61 Motion to Enroll as Counsel. Added as counsel Donald W Price for State of Louisiana. Signed by Magistrate Judge Kathleen Kay on 09/21/2016. (crt,Crick, S) (Entered: 09/22/2016)
- 03/08/2017 63 ELECTRONIC ORDER: Considering the recent ruling by the Fifth Circuit Court of Appeals in the case of Board of Commrs of the Southeast La. Flood Prot. Auth-East v. Tennessee Gas Pipeline Co., LLC, et al, 2017 WL 874999 (5th Cir. Mar. 3, 2017), the court will allow the parties the opportunity to supplement or amend their memoranda to brief the applicability of that ruling to this proceeding. Plaintiff has 30 days or until April 7, 2017 to file a supplemental memorandum in support of its motion to remand. Defendant has 15 days from the filing of plaintiff's memorandum to file a response and plaintiff has 7 days from the filing of defendant's memorandum to file any reply. Signed by Magistrate Judge Kathleen Kay on 3/8/2017. (crt,Solari, E) (Entered: 03/08/2017), (QC'ed on 03/09/2017, by LaCombe , L)
- 03/08/2017 Set/Reset Deadlines: Compliance Deadline set for 4/7/2017. See Electronic Order 63 . (crt,LaCombe, L) (Entered: 03/09/2017)
- 04/07/2017 64 SUPPLEMENTAL MEMORANDUM in Support Regarding the Effect of SLFPA Fifth Circuit Ruling re 18 MOTION to Remand, 52 MOTION to Remand Regarding Supplemental Removal Notice filed by Parish of Cameron. (aty,Marcello, Victor) Modified on 4/7/2017 to modify docket text. (Crick, S). (Entered: 04/07/2017), (QC'ed on 04/07/2017, by Crick , S)
- 04/07/2017 65 SUPPLEMENTAL MEMORANDUM in Support re 27 MOTION to Remand filed by State of Louisiana, State of Louisiana(Ex Rel Jeff Landry). (aty,Jones, Steven) (Entered: 04/07/2017), (QC'ed on 04/07/2017, by Crick , S)
- 04/21/2017 66 SUPPLEMENTAL MEMORANDUM in Opposition re 18 MOTION to Remand , 27 MOTION to Remand *Regarding the Effect of the Fifth Circuit's Ruling in the Board of Commissioners Case per Doc 63* filed by B P America Production Co, Chevron Pipe Line Co, Chevron U S A Holdings Inc, Chevron U S A Inc, Exxon Mobil Corp, Shell Offshore Inc, Shell Oil Co, Swepi L P, Texas Co. (aty,Becker, Kelly) (Entered: 04/21/2017), (QC'ed on 04/21/2017, by FinnSld , P)
- 04/24/2017 67 SUPPLEMENTAL MEMORANDUM in Opposition re 54 MOTION to Remand, 52 MOTION to Remand *Regarding Supplemental Removal Notice* filed by Apache Corp. (Attachments: # 1 Exhibit)(aty,Rodriguez, Carmen) Modified on 4/25/2017 to

modify docket text. (Crick, S). (Entered: 04/24/2017), (QC'ed on 04/25/2017, by Crick , S)

- 04/27/2017 68 REPLY to Response to Motion re 18 MOTION to Remand *Regarding the Supplemental Briefing on the Effect of the Fifth Circuit's Ruling in the Board of Commissioners Case filed by BP America Production Company, Chevron Pipeline Company, Chevron USA Holdings Inc., Chevron USA Inc., Exxon Mobil Corporation, Shell Offshore, Inc., Shell Oil Company, SWEPI LP and The Texas Company* filed by Parish of Cameron. (aty,Marcello, Victor) (Entered: 04/27/2017), (QC'ed on 04/27/2017, by FinnSld , P)
- 04/28/2017 69 REPLY to Response to Motion re 18 MOTION to Remand *Regarding the Applicability of the Fifth Circuit's Ruling in Board of Commissioners* filed by *Apache* filed by Parish of Cameron. (aty,Marcello, Victor) (Entered: 04/28/2017), (QC'ed on 05/01/2017, by FinnSld , P)
- 06/05/2017 70 DEFICIENT NOTICE of Appearance by Joshua A Norris on behalf of Gulfport Energy Corp (Attorney Joshua A Norris added to party Gulfport Energy Corp(pty:dft)) (aty,Norris, Joshua) Modified on 6/6/2017 to indicate deficient status. (Crick, S). Modified on 6/8/2017 indicate 76 Notice of Appearance resubmitted in its entirety. (Crick, S). (Entered: 06/05/2017), (QC'ed on 06/06/2017, by Crick , S)
- 06/05/2017 71 DEFICIENT NOTICE of Appearance by William D Lampton on behalf of Gulfport Energy Corp (Attorney William D Lampton added to party Gulfport Energy Corp(pty:dft)) (aty,Lampton, William) Modified on 6/6/2017 to indicate deficient status. (Crick, S). Modified on 6/8/2017 to indicate 74 Notice of Appearance resubmitted in its entirety.(Crick, S). (Entered: 06/05/2017), (QC'ed on 06/06/2017, by Crick , S)
- 06/06/2017 72 NOTICE of Deficiency to Joshua A Norris on behalf of Gulfport Energy Corp regarding 70 Notice of Appearance. Reason: Signature of attorney is required. (crt,Crick, S) (Entered: 06/06/2017)
- 06/06/2017 73 NOTICE of Deficiency to William D Lampton on behalf of Gulfport Energy Corp regarding 71 Notice of Appearance. Reason: Signature of attorney is required. (crt,Crick, S) (Entered: 06/06/2017)
- 06/08/2017 74 Notice of Appearance of Counsel as to William D Lampton filed by Gulfport Energy Corp regarding 71 Notice of Appearance. (aty,Lampton, William) Modified on 6/8/2017 to modify docket text. (Crick, S). (Entered: 06/08/2017), (QC'ed on 06/08/2017, by Crick , S)
- 06/08/2017 75 NOTICE of Appearance by William Thomas McCall, Jr on behalf of Gulfport Energy Corp (Attorney William Thomas McCall, Jr added to party Gulfport Energy Corp(pty:dft)) (aty,McCall, William) (Entered: 06/08/2017), (QC'ed on 06/08/2017, by Crick , S)
- 06/08/2017 76 Notice of Appearance of Counsel as to Joshua A Norris filed by Gulfport Energy Corp regarding 70 Notice of Appearance. (aty,Norris, Joshua) Modified on 6/8/2017 to modify docket text. (Crick, S). (Entered: 06/08/2017), (QC'ed on 06/08/2017, by

Crick , S)

- 06/10/2017 77 MOTION to Withdraw Steven B Jones as Counsel by State of Louisiana (Ex Rel Jeff Landry). Motions referred to Kathleen Kay. (Attachments: # 1 Proposed order)(aty,Jones, Steven) Modified on 6/12/2017 to modify docket text. (Crick, S). (Entered: 06/10/2017), (QC'ed on 06/12/2017, by Crick , S)
- 06/13/2017 78 ELECTRONIC ORDER granting 77 Motion to Withdraw as Attorney. Attorney Steven B Jones terminated as counsel for State of Louisiana (Ex Rel Jeff Landry). Signed by Magistrate Judge Kathleen Kay on 6/13/2017. (jud,Kay, Kathleen) (Entered: 06/13/2017), (QC'ed on 06/14/2017, by LaCombe , L)
- 07/11/2017 79 MOTION for Leave to File Notice of Supplemental Authorities with consent by Parish of Cameron. Motions referred to Kathleen Kay. (Attachments: # 1 Proposed Notice of Supplemental Authorities, # 2 Proposed Exhibit A - Report & Recommendation, # 3 Proposed Exhibit B - Order and Reasons, # 4 Proposed order)(aty,Marcello, Victor) Modified on 7/11/2017 to modify docket text. (Crick, S). (Entered: 07/11/2017), (QC'ed on 07/11/2017, by Crick , S)
- 07/12/2017 80 ELECTRONIC ORDER granting 79 Motion for Leave to File Notice of Supplemental Authorities. Signed by Magistrate Judge Kathleen Kay on 7/12/2017. (jud,Kay, Kathleen) (Entered: 07/12/2017), (QC'ed on 07/14/2017, by LaCombe , L)
- 07/12/2017 81 NOTICE of Supplemental Authorities by Parish of Cameron (Attachments: # 1 Exhibit A, # 2 Exhibit B)(crt,Crick, S) Modified on 7/14/2017 to modify date of filing. (Crick, S). (Entered: 07/14/2017)
- 07/28/2017 82 MOTION to Schedule Oral Argument, and in the Alternative, Motion for Ruling re 18 MOTION to Remand and 27 MOTION to Remand by Parish of Cameron. Motions referred to Kathleen Kay. (Attachments: # 1 Memorandum / Brief, # 2 Proposed order)(aty,Marcello, Victor) Modified on 7/31/2017 to edit text (Reeves, T). (Entered: 07/28/2017), (QC'ed on 07/31/2017, by Reeves , T)
- 08/09/2017 83 ELECTRONIC MINUTE ENTRY issued by the Clerk. Case reassigned to Unassigned District Judge. Judge Patricia Minaldi no longer assigned to case. All pending motions are referred to Magistrate Judge Kathleen Kay for processing. All deadlines and hearings remain as set pending further review by the court. All future filings should bear the name of the new judge assignment. Approved by Chief Judge Dee D Drell on 8/7/2017. (crt,FinnSld, P) (Entered: 08/09/2017)
- 08/17/2017 84 MOTION for Leave to File Notice of Supplemental Authority with consent by Parish of Cameron. Motions referred to Magistrate Judge Kathleen Kay. (Attachments: # 1 Proposed Notice of Supplemental Authority, # 2 Proposed order, # 3 Exhibit)(aty,Marcello, Victor) Modified on 8/17/2017 to edit text (FinnSld, P). (Entered: 08/17/2017), (QC'ed on 08/17/2017, by FinnSld , P)
- 10/26/2017 85 MOTION for Status Conference by Parish of Cameron. Motions referred to Magistrate Judge Kathleen Kay. (Attachments: # 1 Proposed order)(aty,Bruchhaus, David) (Entered: 10/26/2017), (QC'ed on 10/26/2017, by Crick , S)

- 11/14/2017 86 NOTICE by Parish of Cameron of Letter to Chief Judge S. Maurice Hicks, Jr (aty,Marcello, Victor) (Entered: 11/14/2017), (QC'ed on 11/15/2017, by Crick , S)
- 12/04/2017 87 ORDER **granting** (85) Motion for Status Conference in case 2:16-cv-00530-UDJ-KK; **granting** (120) Motion for Status Conference in case 2:16-cv-00531-UDJ-KK; **granting** (70) Motion for Status Conference in case 2:16-cv-00532-UDJ-KK; **granting** (63) Motion for Status Conference in case 2:16-cv-00535-UDJ-KK; **granting** (89) Motion for Status Conference in case 2:16-cv-00536-UDJ-KK; **granting** (54) Motion for Status Conference in case 2:16-cv-00537-UDJ-KK; **granting** (77) Motion for Status Conference in case 2:16-cv-00538-UDJ-KK; **granting** (69) Motion for Status Conference in case 2:16-cv-00539-UDJ-KK; **granting** (63) Motion for Status Conference in case 2:16-cv-00540-UDJ-KK; **granting** (48) Motion for Status Conference in case 2:16-cv-00541-UDJ-KK; **granting** (61) Motion for Status Conference in case 2:16-cv-00542-UDJ-KK. District Judge Status Conference set for 12/6/2017 10:00 AM by telephone before Chief Judge S Maurice Hicks Jr. Counsel shall use the following information to call into the status conference: 1-877-848-7030, Access Code 4212407. Lead Counsel for Plaintiff, Cameron Parish, shall identify all counsel who will participate in the status conference and supply a list of counsel participating to the Court via email (motions_hicks@lawd.uscourts.gov) no later than 3:00 p.m. on December 5, 2017. Signed by Chief Judge S Maurice Hicks, Jr on 12/4/2017. (crt,Crick, S) (Entered: 12/04/2017)
- 12/04/2017 Set Status Conference: District Judge Status Conference set for 12/6/2017 10:00 AM by telephone before Chief Judge S Maurice Hicks Jr. (crt,Crick, S) (Entered: 12/04/2017)
- 12/04/2017 Set Deadlines: Deadline to submit list of counsel participating in status conference on 12/6/2017 before Judge Hicks set for 12/5/2017 at 3:00 p.m. (crt,Crick, S) (Entered: 12/04/2017)
- 12/06/2017 88 MINUTES for proceedings held before Chief Judge S Maurice Hicks, Jr: STATUS CONFERENCE held on 12/6/2017, denying 86 expedited consideration of pending motions to remand. (crt,McDonnell, D) (Entered: 12/07/2017)
- 01/17/2018 89 REPORT AND RECOMMENDATIONS: IT IS RECOMMENDED that the Motions to Remand, 18 MOTION to Remand filed by Parish of Cameron, 27 MOTION to Remand filed by State of Louisiana, 52 MOTION to Remand Regarding Supplemental Removal Notice Filed by Apache Corporation Alleging Substantial Federal Question Jurisdiction filed by Parish of Cameron and 54 MOTION to Remand filed by State of Louisiana, are GRANTED and that the matter be remanded to the 38th Judicial District Court, Cameron Parish, Louisiana. IT IS ALSO RECOMMENDED that 82 MOTION to Schedule Oral Argument and in the Alternative, Motion for Ruling re 18 MOTION to Remand 27 MOTION to Remand filed by Parish of Cameron; 84 MOTION for Leave to File Notice of Supplemental Authority with consent filed by Parish of Cameron; and 85 Motion for Status Conference be DENIED AS MOOT. Objections to R&R due by 1/31/2018. Signed by Magistrate Judge Kathleen Kay on 1/17/2018. (crt,LaCombe, L) (Entered: 01/18/2018)

- 01/31/2018 90 OBJECTION to 89 Report and Recommendations by Parish of Cameron, State of Louisiana, State of Louisiana(Ex Rel Jeff Landry). Response to Objection to R&R due by 2/14/2018 (Attachments: # 1 Memorandum/Brief)(aty,Marcello, Victor) Modified on 2/1/2018 to modify docket text. (Crick, S). (Entered: 01/31/2018), (QC'ed on 02/01/2018, by Crick , S)
- 01/31/2018 91 OBJECTION to 89 Report and Recommendations by B P America Production Co, Chevron Pipe Line Co, Chevron U S A Holdings Inc, Chevron U S A Inc, Exxon Mobil Corp, Shell Offshore Inc, Shell Oil Co, Swepi L P, Texas Co. Response to Objection to R&R due by 2/14/2018 (Attachments: # 1 Memorandum / Brief, # 2 Exhibit A)(aty,Becker, Kelly) Modified on 2/1/2018 to modify docket text. (Crick, S). Modified on 2/9/2018 to indicate 96 Notice of Supplemental Authority filed. (Entered: 01/31/2018), (QC'ed on 02/01/2018, by Crick , S)
- 01/31/2018 92 Objections to 89 REPORT AND RECOMMENDATIONS filed by Enervest Operating L L C . (aty,Degan, Nancy) Modified on 2/1/2018 to more accurately describe document. (Crick, S). (Entered: 01/31/2018), (QC'ed on 02/01/2018, by Crick , S)
- 01/31/2018 92 OBJECTION to 89 Report and Recommendations by Enervest Operating L L C. Response to Objection to R&R due by 2/14/2018. ADMINISTRATIVE ENTRY as this document was electronically filed in error as 92 Response. (crt,Crick, S) Modified on 2/1/2018 to modify docket text and add document number. (Crick, S). (Entered: 02/01/2018)
- 02/01/2018 93 OBJECTION to 89 REPORT AND RECOMMENDATIONS by Apache Corp. (Attachments: # 1 Exhibit, # 2 Memorandum / Brief)(aty,Rodriguez, Carmen) Modified on 2/2/2018 to more accurately describe document. (Crick, S). (Entered: 02/01/2018), (QC'ed on 02/02/2018, by Crick , S)
- 02/01/2018 93 OBJECTION to 89 Report and Recommendations by Apache Corp. Response to Objection to R&R due by 2/15/2018. ADMINISTRATIVE ENTRY as this document was electronically filed in error as 93 Response. (crt,Crick, S) Modified on 2/2/2018 to modify docket text and add document number. (Crick, S). (Entered: 02/02/2018)
- 02/06/2018 94 Unopposed MOTION for Leave to File Notice of Supplemental Authority re 91 Objections to 89 Report & Recommendation by B P America Production Co, Chevron Pipe Line Co, Chevron U S A Holdings Inc, Chevron U S A Inc, Exxon Mobil Corp, Shell Oil Co, Swepi L P, Texas Co. Motions referred to Magistrate Judge Kathleen Kay. (Attachments: # 1 Proposed pleading, # 2 Proposed order) Modified on 2/6/2018 to modify docket text, create docket entry relationship and capture appropriate motion event. (Crick, S). (Entered: 02/06/2018), (QC'ed on 02/06/2018, by Crick , S)
- 02/07/2018 95 ELECTRONIC ORDER granting 94 Motion for Leave to File Notice of Supplemental Authority. Signed by Magistrate Judge Kathleen Kay on 2/7/2018. (jud,Kay, Kathleen) (Entered: 02/07/2018), (QC'ed on 02/09/2018, by LaCombe , L)

- 02/07/2018 96 NOTICE of Supplemental Authority re 91 Objections to 89 Report and Recommendation by B P America Production Co, Chevron Pipe Line Co, Chevron U S A Holdings Inc, Chevron U S A Inc, Exxon Mobil Corp, Shell Offshore Inc, Shell Oil Co, Swepi L P, Texas Co. (crt,Crick, S) Mo (Entered: 02/09/2018)
- 02/14/2018 97 RESPONSE TO OBJECTION to 89 Report and Recommendations by Parish of Cameron, State of Louisiana, State of Louisiana(Ex Rel Jeff Landry). (Attachments: # 1 Exhibit A - List of Eastern District Suits, # 2 Exhibit B - Cases Denying Removal Into Admiralty)(aty,Marcello, Victor) Modified on 2/14/2018 to modify docket text. (Crick, S). (Entered: 02/14/2018), (QC'ed on 02/14/2018, by Crick , S)
- 02/14/2018 98 RESPONSE TO OBJECTION by Apache Corp to 89 Report and Recommendations by Parish of Cameron, State of Louisiana, State of Louisiana(Ex Rel Jeff Landry). (aty,Marcello, Victor) Modified on 2/15/2018 to modify docket text. (Crick, S). (Entered: 02/14/2018), (QC'ed on 02/15/2018, by Crick , S)
- 02/14/2018 99 RESPONSE to Objection by Plaintiffs and Intervenors to 89 Report and Recommendations by Apache Corp. (Attachments: # 1 Exhibit)(aty,Rodriguez, Carmen) Modified on 2/15/2018 (Crick, S). (Entered: 02/14/2018), (QC'ed on 02/15/2018, by Crick , S)
- 02/14/2018 99 RESPONSE TO OBJECTION by Plaintiffs and Intervenors to 89 Report and Recommendations by Apache Corp. ADMINISTRATIVE ENTRY as document was electronically filed in error as 99 Response. (crt,Crick, S) Modified on 2/15/2018 to add document number. (Crick, S). (Entered: 02/15/2018)
- 05/07/2018 100 ELECTRONIC MINUTE ENTRY issued by the Clerk. Case reassigned to Judge Terry A. Doughty. All motions previously pending are transferred to Judge Doughty. All deadlines and hearings remain as set pending further review by the court. All future filings should bear the name of the new judge assignment. Approved by Chief Judge S Maurice Hicks, Jr on 5/7/2018.(crt,Reasor, M) (Entered: 05/07/2018)
- 05/09/2018 101 MEMORANDUM RULING re 89 REPORT AND RECOMMENDATION of the Magistrate Judge re 18 MOTION to Remand filed by Parish of Cameron, 27 MOTION to Remand filed by Parish of Cameron, 52 MOTION to Remand *Regarding Supplemental Removal Notice Filed by Apache Corporation Alleging Substantial Federal Question Jurisdiction* filed by Parish of Cameron, and 54 MOTION to Remand filed by State of Louisiana. Signed by Judge Terry A Doughty on 5/9/2018. (crt,Crawford, A) (Entered: 05/09/2018)
- 05/09/2018 102 JUDGMENT re 89 Report and Recommendation of the Magistrate Judge. It is Ordered that 18 , 27 , 52 , and 54 Motions and Supplemental Motions to Remand are Granted. This matter is remanded to the 38th Judicial District Court, Cameron Parish, Louisiana. It Is Further Ordered that 82 Motion for Oral Argument, 84 Motion for Leave to File Notice of Supplemental Authority and 85 Motion for Status Conference are Denied As Moot. Signed by Judge Terry A Doughty on 5/9/2018. (crt,Crawford, A) (Entered: 05/09/2018)

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION

RECEIVED & FILED
2018 MAY 14 A 10:23
CLERK OF COURT
CAMERON PARISH, LA

PARISH OF CAMERON, ET AL.

CIVIL ACTION NO. 16-530

VERSUS

JUDGE TERRY A. DOUGHTY

AUSTER OIL & GAS, INC., ET AL.

MAG. JUDGE KATHLEEN KAY

JUDGMENT

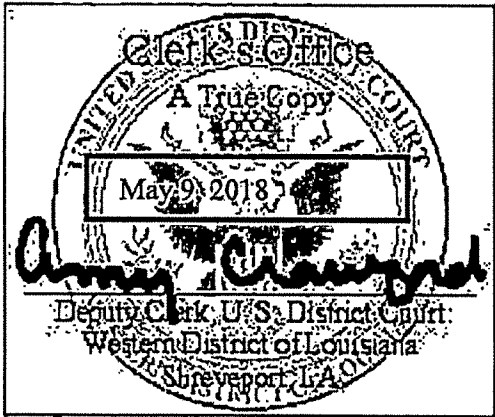
For the reasons set forth in the Report and Recommendation of the Magistrate Judge [Doc. No. 98], to the extent adopted by this Court after a *de novo* review of the entire record, including the objections and responses, and for those additional reasons set forth in this Court's Ruling,

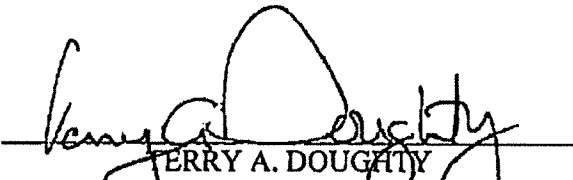
IT IS ORDERED that the Motions and Supplemental Motions to Remand [Doc. Nos. 18, 27, 52 & 54] filed by Plaintiff Parish of Cameron and Intervenor the State of Louisiana *ex rel.* Jeff Landry, Attorney General and through the Louisiana Department of Natural Resources, Office of Costal Management, and Louisiana Department of Natural Resources, Thomas F. Harris are GRANTED. The Clerk of Court is hereby instructed to remand this matter to the 38th Judicial District Court, Cameron Parish, Louisiana, forthwith.

IT IS FURTHER ORDERED that the related Motion for Oral Argument [Doc. No. 82], Motion for Leave to File Notice of Supplemental Authority [Doc. No. 84], and Motion for Status

Conference [Doc. No. 85] as DENIED AS MOOT.

MONROE, LOUISIANA, this 9th day of May, 2018.




PERRY A. DOUGHTY
UNITED STATES DISTRICT JUDGE

WALL, BULLINGTON & COOK, LLC

ATTORNEYS
540 ELMWOOD PARK BLVD.
NEW ORLEANS, LA 70123
504 736 0347
504 734 8574 FAX
lgilthorpe@wallbullington.com

May 17, 2018

Ref: 0745

VIA US MAIL

Clerk of Court
Cameron Parish
P.O. Box 549
Cameron, LA 70631

FAX FILED:
May 17, 2018
D. Savoie
Deputy Clerk of Court

RECEIVED & FILED
2018 MAY 21 P 1:16
CLERK OF COURT
CAMERON PARISH, LA.

Re: *The Parish of Cameron v. Auster Oil and Gas, Inc., et al.*,
Docket no. 10-19582, 38th JDC, Cameron Parish, Louisiana

Dear Clerk,

Enclosed find one original and one copy of Taylor Energy Company, LLC's Request for Notice, which was fax filed. Please file the original and return a conformed copy in the envelope provided. Also enclosed is a check for \$47.00 to cover your fees. If you have any questions, please do not hesitate to contact our office.

Thanking you in advance for your help, I remain,

Sincerely,

Lindsay M. Gilthorpe

Lindsay M. Gilthorpe
Legal Assistant

Enclosures

RECEIVED & FILED
2018 MAY 21 P 1:16
CLERK OF COURT
CAMERON PARISH, LA.

38th JUDICIAL DISTRICT COURT FOR THE PARISH OF CAMERON

STATE OF LOUISIANA

DOCKET NO. 10-19582

THE PARISH OF CAMERON FAX FILED:

VERSUS

AUSTER OIL AND GAS, INC., ET AL.

4 May 17, 2018

D. Savoie

Deputy Clerk of Court

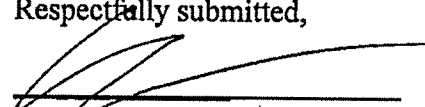
FILED: _____

DEPUTY CLERK OF COURT

REQUEST FOR WRITTEN NOTICE

Pursuant to Article 1571 and 1572 of the Louisiana Code of Civil Procedure, undersigned counsel for defendant, Taylor Energy Company, LLC, hereby requests written notice of all hearings, trials, orders, judgments, interlocutory decrees, and all formal steps taken by the parties herein, the Judge or any member of Court, as provided in the Louisiana Code of Civil Procedure, particularly, but not limited to articles 1912-1917.

Respectfully submitted,


Guy E. Wall, T.A. (#7718)
Jonathan R. Cook (#25629)
Sara Lewis (#32558)
Maurine Wall Laborde (#34139)
Wall, Bullington & Cook, LLC
540 Elmwood Park Blvd
New Orleans, Louisiana 70123
Telephone: (504) 736-0347
Fax: (504) 734-8574

Attorneys for Taylor Energy Company, LLC

CERTIFICATE OF SERVICE

The undersigned counsel of record hereby certifies that a copy of the above and foregoing has been served on all counsel by electronic means on this 17 of May, 2018.



SUSAN RACCA
CAMERON PARISH CLERK OF COURT
P O BOX 549
CAMERON, LA. 70631
TELEPHONE: 337/775-5316 FAX: 337/775-7172

RECEIPT OF CIVIL FAXED FILINGS

The Parish of Cameron : 38TH Judicial District Court

Vs No: 10-19582 : Parish of Cameron

Auster Oil & Gas Inc et al : State of Louisiana

Dear Mr. Wall,

I hereby acknowledge receipt of your Request for written notice

for filing on this 17th day of May, 2018 Within 7

days, exclusive of legal holidays, you must forward to the following:

- (1) The original signed document.
- (2) Filing fee of \$ 47.00 of which will include a \$5.00 transmission fee and fax charges.
- (3) SUIT HAS ENOUGH MONEY TO COVER COST

Please send a check for the total charges due.

DEBBIE SAVOIE
Deputy Clerk of Court

504-734-8574

WALL, BULLINGTON & COOK, LLC

ATTORNEYS
540 ELMWOOD PARK BLVD.
NEW ORLEANS, LA 70123
(504) 736-0347
FAX: (504) 734-8574

FAX TRANSMISSION

CONFIDENTIALITY NOTICE: This facsimile transmission (along with any documents accompanying it) is intended only for the person(s) to whom it is addressed and may contain confidential, privileged information. If you are not the intended recipient, you are notified that any disclosure, copying, or distributing of or taking any action in reliance on the contents of this information is strictly prohibited. Please call us immediately if the transmission you have received is incomplete, illegible, or has been received by you in error.

MATTER: 0745

TO: Clerk of Court

FAX NO. (337) 775-7172

FROM: Lindsay Gilthorpe

DATE: May 16, 2018

No. of pages (including this page): 3

MESSAGE:

Sent by: Lindsay

WALL, BULLINGTON & COOK, LLC

ATTORNEYS
540 ELMWOOD PARK BLVD.
NEW ORLEANS, LA 70123
504 736 0347
504 734 8574 FAX
lgilthorpe@wallbulling.com

May 16, 2018

Ref: 0745

VIA FAX (337) 775-7172

Clerk of Court
Cameron Parish
P.O. Box 549
Cameron, LA 70631

RECEIVED & FILED
2018 MAY 17 A 10:23
CLERK OF COURT
CAMERON PARISH, LA.

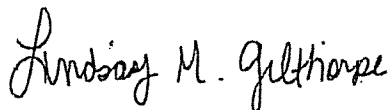
Re: *The Parish of Cameron v. Auster Oil and Gas, Inc., et al.*,
Docket no. 10-19582, 38th JDC, Cameron Parish, Louisiana

Dear Clerk,

Enclosed find Taylor Energy Company, LLC's Request for Notice, which is being fax filed. Please file with today's date. The original and any fee required will follow by mail. If you have any questions, please do not hesitate to contact our office.

Thanking you in advance for your help, I remain,

Sincerely,



Lindsay M. Gilthorpe
Legal Assistant

Enclosures

cc: All counsel of Record (via email)

38th JUDICIAL DISTRICT COURT FOR THE PARISH OF CAMERON

STATE OF LOUISIANA

DOCKET NO. 10-19582

THE PARISH OF CAMERON

VERSUS

AUSTER OIL AND GAS, INC., ET AL.

RECEIVED & FILED
2018 MAY 17 A 10:23
CLERK OF COURT
CAMERON PARISH, L.A.

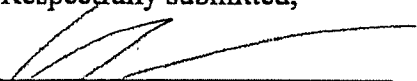
FILED: _____

DEPUTY CLERK OF COURT

REQUEST FOR WRITTEN NOTICE

Pursuant to Article 1571 and 1572 of the Louisiana Code of Civil Procedure, undersigned counsel for defendant, Taylor Energy Company, LLC, hereby requests written notice of all hearings, trials, orders, judgments, interlocutory decrees, and all formal steps taken by the parties herein, the Judge or any member of Court, as provided in the Louisiana Code of Civil Procedure, particularly, but not limited to articles 1912-1917.

Respectfully submitted,

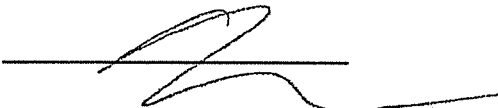


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Jonathan R. Cook (#25629)
Sara Lewis (#32558)
Maurine Wall Laborde (#34139)
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Fax: (504) 734-8574

Attorneys for Taylor Energy Company, LLC

CERTIFICATE OF SERVICE

The undersigned counsel of record hereby certifies that a copy of the above and foregoing has been served on all counsel by electronic means on this 16th of May, 2018.



MEMORY TRANSMISSION REPORT

TIME :05-17-2018 10:36
FAX NO.1 :
NAME :

FILE NO. : 813
DATE : 05.17 10:35
TO : 15047348574-3400
DOCUMENT PAGES : 2
START TIME : 05.17 10:35
END TIME : 05.17 10:36
PAGES SENT : 2
STATUS : OK

SUCCESSFUL TX NOTICE

SUSAN RACCA
CAMERON PARISH CLERK OF COURT
P O BOX 549
CAMERON, LA. 70631
TELEPHONE: 337/775-5316 FAX: 337/775-7172

RECEIPT OF CIVIL FAXED FILINGS

The Parish of Cameron : 38TH Judicial District Court
Vs No: 10-19582 : Parish of Cameron
Quater Oil & Gas Inc et al : State of Louisiana

Dear Mr. Wall

I hereby acknowledge receipt of your Request for written notice

for filing on this 17th day of May, 2018
~~delays, cancellations and beyond the clerk's control. You must forward the case to the clerk's office.~~

- (1) The original signed document.
 - (2) Filing fee of \$ 47.00 of which will include a \$5.00 transmission fee and fax charges.
 - (3) SUIT HAS ENOUGH MONEY TO COVER COST
- Please send a check for the total charges due.

DEBBIE SAVOIE
Deputy Clerk of Court
504 - 734 - 8574

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May 15, 2018

Hon. Susan Racca
Clerk of Court, Cameron Parish
38th Judicial District Court
Post Office Box 549
Cameron, LA 70631-0549

RE: The Parish of Cameron
VS. Auster Oil and Gas, Inc., et al
Docket No. 10,19582

RECEIVED & FILED
2018 MAY 18 A 10:05
CLERK OF COURT
CAMERON PARISH, LA.

Dear Ms. Racca:

Enclosed please find a Request for Notice of Trial, Notice of Judgment, and Notice of Representation which I ask be filed of record on behalf of Vernon E. Faulconier, Inc. Our check in the amount of \$50.00 is enclosed to cover the cost of filing.

With best wishes, I am,

Sincerely yours,

**GUGLIELMO, LOPEZ, TUTTLE,
HUNTER & JARRELL**

BY: 

Charles M. Jarrell

CMJ:dal
cc: All Known Counsel of Record (via email)
1081.400

THE PARISH OF CAMERON RECEIVED & FILED NO. 10-19582
VERSUS 2018 MAY 18 10:05 AM JUDICIAL DISTRICT COURT
AUSTER OIL AND GAS, INC., ET AL CLERK OF COURT
CAMERON PARISH, LOUISIANA
*****CAMERON PARISH, LA*****

**REQUEST FOR NOTICE OF TRIAL, NOTICE OF JUDGMENT,
AND NOTICE OF REPRESENTATION**

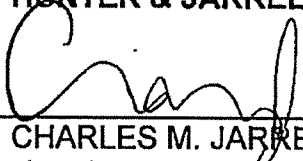
TO: CLERK OF COURT
PARISH OF CAMERON

Please be advised that undersigned counsel will represent defendant, VERNON E. FAULCONER, INC., and do hereby request that written notice be mailed to undersigned counsel by the Clerk, by certified mail, properly stamped and addressed, at least ten (10) days before the date fixed for the trial on the merits hereof, or any hearing on any other matter herein, all in accordance with La. C.C.P. art. 1572.

It is further requested that the undersigned be sent notice of the rendition and signing of all final judgments and interlocutory orders or judgments pursuant to La. C.C.P. articles 1913 and 1914.

BY ATTORNEYS:

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HUNTER & JARRELL

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THE PARISH OF CAMERON

DOCKET NO. 10-19582

VERSUS

38TH JUDICIAL DISTRICT COURT

AUSTER OIL AND GAS, INC., ET AL

CAMERON PARISH, LOUISIANA

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the above and foregoing pleading has been forwarded to the following counsel of record by electronic mail and/or by placing same in the United States mail, postage prepaid, and properly addressed.

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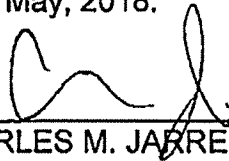
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Opelousas, Louisiana, this 16th day of May, 2018.



CHARLES M. JARRELL